DISPOSAL RESTRICTION INSPECTIO

Facility:	AMERICAN Steel FOUNDRIES (ASF)
ractificy.	OHD 981 909 4/8.
Street:	10P1 E. Broadway St.
City:	Alliance State: 04 Zip: 4460/
Telephone:	(216) 823-6150
Owner/Operator:	
Street:	205 N.Michigan Chicago state: IL zip: 6060/
City:	chicago state: 12 Zip: 6060/
Telephone:	7
Inspection Date: Weather Conditions:	7 5+6,90 Time: 4:00 pm & 9:00 am Cloudy Temps. 80°F, Over Cast 72°F
Inspectors:	Name Adency/Title Telephone Ahmed Mustafa, OEPA-NEDO/ENV. Eng. (216)-425-917/ Mark Bergman, OEPA-NEDO/ENV. Eng. (216)-425-917/
Facility Representative:	BILL HEGSTAND, SAFety
r a	
	Generate Transport Treat Store Dispose
F-Solvent	_X
Dioxin	
California List	<u>X</u>
First Third	
Second Third	
į	1 Revised 10-20-89

INSPECTION SIMPLRY

Processes That Generate IIR Wastes

- PARTS cleaning Solvents, consisting of To laune and tetrachboroethylene and Pentachloroethylene. The Waste generated Es coded as Fool & Foos

Waste generated Es coded as Fool & Foos

PARTS cleaning Naphtra, it is used to clean

pant and Remains Captive in a product Form until

Removed by Safety Kleen as a waste, that is coder

Dool.

LOR Waste Management

Fool & Foot ane accumulated in 55 Gallon Dra. and Sent to safety Kleen, New Castle, Ky For Reclaimation.

Dool is generated at the time Safety Keen pickup the spent product from the Container, It is sent to Safety Kleen, Kent, o hio.

ASF generates NON-Waste Water Doos, Doob, & Doos Which are NOT a subject of LDR, until August 1990.

ASF USES LDR Forms and amplete tup to that

RCRA LAND DISPOSAL RESIRICTION INSPECTION

WASIE IDENTIFICATION

1.	Does	the facility handle the following wastes?
	a.	F001 through F005 spent solvents
		Yes X No _ List* Fool & Foo5 only
	b.	Dioxin-containing Wastes
		Yes No 🙏 List*
	c.	California List Wastes
		Yes X No List* Dool
	đ.	First and Second Third Wastes
		Yes No X List*
		* List wastes if room allows or attach Appendix A.
		Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).
2.	Doe	s the facility handle the following wastes (national capacity variances)?
t	a.	FOO1 - F005 contaminated soil or debris resulting from a CFRCIA response action or RCRA corrective action (effective date — $11/08/90$).
		Yes No \(Comments
f J	b.	Dioxin contaminated soil and debris resulting from a CERCIA response action or a RCRA corrective action (effective date — $11/08/90$).
		Yes No X Comments
	C.	California list contaminated soil or debris resulting from a CFRCIA response action or a RCRA corrective action (effective date — 11/08/90).
		Yes No X Comments

đ.	First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).
	Yes No X Comments
e.	First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).
	Yes No \(\sum \) Comments
f.	Second Third contaminated soil and debris which have a treatment standard based on incineration — F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).
	Yes No X Comments

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A.

Trea	tability Group - Treatment Standards Identification
1.	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes X No NA
	If yes, check the appropriate treatability group.
	Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight) All other spent solvent wastes
2.	First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NA
	If yes, list the waste code and check the correct treatability group.
	Waste Code Wastewater* Non-wastewater
	* Less than 1% TOC by weight and less than 1% filterable solids.
3.	California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?
	a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)? Yes No NA
	If yes, specify the method:
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	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]?
	Yes No NA
	If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:
С.	For hazardous waste that contains halogenated organic compounds (HOCs) in total concentrations greater than or equal to 1,000 mg/L or 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart 0 or 40 CFR Part 265 Subpart 0?
	Yes No NA
4. Does	the generator mix restricted wastes with different treatment adards?
Yes	No <u> </u>
If 3	yes, did the generator select the most stringent treatment standards 3.41(b), 268.43(b))?
Yes	No Comments
<u>Waste An</u>	
l. Doe	s the generator determine whether the restricted waste exceeds atment standards or prohibition levels at the point of generation by:
-	Knowledge of waste Yes X No
	List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination. * Dool: The use of MSDS Form S, which is given to ASF by Sfety Kleen.
	Kieen. Kieen. * Fool & Foos: By knowledge of the process, then tested to confirm

В.

	Ţ	Was all supporting data retained on-site, [268.7(a)(5)]?
		Yes X No
	_	TCLP Yes No NA X
		List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
		Total constituent analysis Yes X No NA
		List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. Doo), Fool, Foos + 0/3/1990 + As generated and Swiped to safety Kleen.
		$pH \le 2$ Yes No _ NA _ X List the wastes for which pH testing was used.
1	_	Paint Filter Liquid Test Yes No NA X List the wastes for which PFLT was used.
2.,	Does trea	the facility dilute the restricted waste as a substitute for adequate tment [268.3]?
	Yes .	No NA
C.	<u>Mana</u>	<u>genent</u>
	1.	On-Site Management
		Is restricted waste treated, stored for greater than 90 days, or disposed on-site? Yes X No _ Comments F-Solvent GS Stored Gn Site Since Dec. 2
		Yes X No _ Comments F-Solvent has stored with the
a J		If yes, the TSD Checklist must be completed.
		Darigod 10-20-89

Off-S	Site Management		
a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?		
	Yes X No (If no, go to b)		
	If yes, identify waste code and off facilities:		
	Waste Code Facilities Dool Safety Kleen Fool & Safety Kleen	Newcastle, Ky. Treat	
	F005		
-	Does the generator provide notification facility [268.7(a)(1)]?	ation to the treatment or storage	
	Yes X No		
	Does notification contain the foll-		
	EPA Hazardous waste number(s)	Yes X No	
1 Notes	Applicable treatment standards and prohibition levels	Yes X No	
•	Manifest number	Yes 💢 No	
•	Waste analysis data, if available	Yes X No	
b.	Does the facility ship any waste to an off-site disposal facility?	hat meets the treatment standards	
	Yes X No _ (If no, go to	c)	
	If yes, identify waste code and o	ff-site disposal facilities:	
	Waste Code	Facility	
	DOO 1 [Combustible Liquid] RQ WASTE OIL	Safety Kleen, Kent, Ohio	
	while off		

-	Does the facility provide notificat the disposal facility [268.7(a)(2)]	ion and ce]?	ertification to
	Yes No		
-	Does notification contain the follow	owing?	
	EPA Hazardous waste number(s)	Yes	No
	Applicable treatment standards and prohibition levels	Yes	No
	Manifest number	Yes	
	Waste analysis data, if available	Yes	Уо
·	Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes	
C.	Is the waste subject to a nationwe extension (268.5), or no migration	ide variand n petition	ce, case-by-case (268.6).
	162 160 	no, go to	
-	If yes, does the generator provid receiving facility that the waste disposal [268.7(a)(3)]?	e notifica is not pr	tion to the off-site ohibited from land
₹.	Yes No		
_	Does the notification contain the		
	EPA hazardous waste number	Yes	No
	The corresponding treatment stand and all applicable prohibitions	dards Yes	5 No
	Manifest number	Yes	s No
	Waste analysis data, if available	e Ye	s No
	Date the waste is subject to the prohibitions		s No
d.	Does the facility generate any F waste?	irst or Se	cond Third "soft hammer"
	Yes No (If no,	go to 4)	•
	· · · · · · · · · · · · · · · · · · ·		rised 10-20-89

/-	- 1	Does the generator provide the following receiving facility with each shipment of	notification to the waste [268.7(a)(4)]?
		(i) EPA hazardous waste number	Yes No
	Y	(ii) Applicable prohibition [268.33(f), 268.34(h)]	Yes No
	(i	ii) Manifest number	Yes /10
	·	(iv) Waste analysis data, if available	Yes/ No
3.	"Soft	Hammer" Demonstrations/Certifications	
	a.	Are any "soft hammer" wastes or treatment ultimate disposal in a landfill or surf	nt residues destined for ace impoundment?
		Yes No\	/
	b.	Has the generator attempted to locate a recovery facilities that provide treatment environmental benefit [268.8(a)(1)]?	nent that yields the greatest
		Yes No /	ricination to the
	C.	Has the generator submitted a demonstrational Administrator to document its available treatment [268.8(a)(2)]?	efforts to locate practically
		Yes No	
		If yes, did the generator submit the dicertification prior to first shipment?	ocumentation and
		Yes No	
	đ.	Does the demonstration contain the fol	lowing information?
		A list of facilities and facility officials contacted?	Yes No
		Addresses	Yes No
•		Telephone numbers	Yes \NO
		Contact dates	Yes No
		Certification statement	Yes No _
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		,	

GEN Attach a copy of the demonstration and certification. If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]? NO ___ NA ___ Yes If yes, attach a copy of written discussion. Does the generator ship its "soft hammer" waste off-site for treatment? Yes ___ No . Describe the type of treatment and treatment facilities: Treatment Facility Type of Treatment Waste Code g. Did the generator send a copy of its demonstration and

certification to the receiving facility with the first shipment of waste?

Yes No.

Does the generator provide certification with each subsequent h. shipment of wastes to receiving facilities?

No ___ NA ___

Records Retention 4.

f.

Does the facility retain on-site copies of all notifications, demonstrations, and certifications for a period of 5 years [268.7(a)(6)]?

Yes X No _ comments LDK Notifications begun Dec , 1989.

		Corrective Action and CERCIA Response Action Waste NA
D.	RCRA	Corrective Action and CERCIA RESponse Action Response
	1.	Has the facility disposed of contaminated soil and debris from a RCRA correstive action or a CFRCIA response action in a landfill or surface impoundment?
		Yes No Comments
	2.	Did the unit meet the minimum technology requirements (double liner, leachate collection system, and ground water monitoring)?
		YesNo NA Comments
E.	Trea	tment Using RCRA 264/265 Exempt Units or Processes NA
••	1.	Is waste treated in RCRA 264/265 exempt units (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)?
		Yes No List types of waste treatment units and processes:
	•	Waste Code Type of Treatment Treatment Units and Processes
	2.	Are treatment residuals generated from these units?
		Yes No Comments
, !		If yes, the residues are subject to the IDR generator requirements.
.i	3.	Are these residuals further treated, stored for greater than 90 days, or disposed on-site?
		Yes NA _ Comments
		If yes, the TSD checklist must be completed.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

NA

TRAN	SPORTER REQUIREMENTS			•			•	
Α.	Does the transporter [268.50%a)(3)]?	accumulate	waste	for	more	than	10	days

'в.

C.

[268.50(a)(3)]?
Yes No
If yes, check the appropriate regulatory status:
Interim status for storage RCRA permit for storage
If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
Does the transporter mix, combine, or recontainerize wastes?
Yes No
If yes, list the restricted wastes that have been mixed.
Is the waste treated in an exempt treatment process on-site?
Yes No
\ .

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RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A.

Gene	eral Fac	cility Standards				
l.	Does 1	the waste analysis plan	cover Part	268 requ	irements	[264/265.13]? * ASF Does No.
]	F-solvent (TCLP)*	Yes	No 💢	NA	Have a wast. Analysis Plan
		Dioxin (TCLP)	Yes	No	X AM	
		California List , (PFLT and/or total cons	it it there can	, <u></u>	4	
		First & Second Third (TCLP and/or total cons	Yes stituent an	No malysis)		,
		* TCLP= Toxicity Charac PFLT= Paint Filter L:	idmos reso	, (24, 010)		•
2.	Does wast	the facility obtain repeat and residues? X No Comments	This D	one !	safkly k	leen prior to Shippy
	a.	What date was the wast		_1~~ 1~~	- revised?	AZZT .
!	b.	Are analyses conducted	on-site o	r off-sit	e?	
		Identify off-site lab	Sal	ery		
	c.	Are F-solvent and dion TCLP?		ning waste	e analyzed	using
		Yes No X	·			

		d.	Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).
			Yes X No NA
		e.	Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified BNAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.
			Yes No NA
			* BDAT= best demonstrated available technology
	3.	[26	the operating records, including analyses and quantities, complete 4/265.73]? ** It is Done on Drum Storage area (unpermittee polyfack containers which contained less than qo DAYs Drums(HAZundous).
		Yes	qo DAYS Drums (HAZundons).
	4.	and	operating records contain copies of the notification, certification, definition of the demonstration (if applicable) from the generator? Records must be
		Yes	t until closure of unit. No Comments No Permitted Units on-Site.
в.	Sto	rage	(268.50)
	l.	Are	prohibited wastes* stored on-site?
		Yes	(If no, go to C, Treatment.)
,	·	* F	Prohibited wastes are a subset of restricted wastes, i.e., they are ose restricted wastes that are currently ineligible for land disposal FR 31208, August 17, 1988].
_	-2.	If	yes, identify storage unit.
			Containers Other (Identify inappropriate storage unit(s).
	3.	Ar en	e all containers clearly marked to identify the contents and date(s) tering storage [268.50(a)(2)]?
,		Ye	
			Revised 10-20-89

	N/T
4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?
	Yes No
5.	Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?
	Yes No _ NA
6.	Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?
	Yes No NA
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?
	Yes No
7.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?
	Yes No NA
8.	Have wastes been stored for more than 1 year since the applicable IDR megulations went into effect [268.50(c)]?
	Yes No NA /
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No NA
	If yes, state how:
9.	or equal to 50 ptm being stored.
	a. In a facility meeting the TSCA criteria in 761.65(b)?
	Yes No NA
	b. More than one year [268.50(f)]?
	Yes No NA 3 Revised 10-20-89

c.	Treat	ment.
`	1.	Does the facility treat restricted wastes other than in surface impoundments?
		Yes No (If No, go to D, Surface Impoundments.)
	2.	Describe the waste codes and treatment processes:
		Waste Code Treatment Processes
	3.	Was dilution used as a substitute for treatment [268.3]?
		Yes No Comments
	4.	Does the facility, in accordance with an acceptable waste analysis plan, test the residue from all treatment processes [268.7(b)]?
		Yes No Comments
		Have treatment standards or prohibition levels been met?
١		Yes No Comments residue to an off-site
	5.	Does the facility ship any vaste or treatment residue to an off-site disposal facility?
:		Yes No MA
	<i>t</i> .‡	If yes, does the treatment facility provide notification and certification to the disposal facility [268.7(b)(4) and (5)]??
	•	Yes No (If yes, the Generator portion of the checklist must be completed.)
	6.	If the waste or treatment residue will be further managed at a different treatment or storage facility, has the facility complied with the generator notice and certification requirements [268.7(a)]?
	,	/tes No

٧.	Does the facility treat "soft hammer" wastes?
	Yes No (If no, go to 8.)
	a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?
	yes No
	b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?
	Yes No
8.	Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?
	Yes No NA
	If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [268.8(c)(2)]?
	Yes No NA
	Identify waste codes and off-site facilities:
	Waste Code Facility
	gortifications (if applicable),
9.	Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?
	Yes No

		1 A A
D.	Surfa	ace Impolinents
		Are prohibited wastes placed in surface impoundments for treatment?
	1.	Are prohibited wastes process in the Following and the Following are to Following and the Following are to Following and the Following are to
		Yes No List (If no, go to E, Land
		Disposal. /
		Are evaporation or dilution the only recognizable treatment occurring in
	2.	the surface impoundment?
		Yes No \
	3.	Did the facility submit to the Agency, the waste analysis plan, as
	٥.	
		ground-water monitoring requirements?
		Yes No ,
		If the minimum technology requirements have not been met, has a waiver
	4.	If the minimum technology requirements have its
		been granted for that unit?
		Yes No NA \
		Have the Subpart F groundwater monitoring requirements been met?
	5.	
	,	Yes No NA /
	_	Are representative samples of the sludge and supernatant from the Are representative samples of the sludge and supernatant from the
1	6.	Are representative samples of the sludge and superliatant from the surface impoundment tested separately, acceptably, and in accordance with surface impoundment tested separately, acceptably, and in accordance with surface impoundment tested separately, acceptably, and in accordance with
		the sampling frequency and distribution
		plan?
		Yes No/
,	•	
ή		Attach test results.
	7.	Do the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the treatment of the hazardous waste residues (sludges or liquids) exceed the hazardous waste residues (sludges or liquids) exceed the hazardous waste residues (sludges or where no treatment standards are
		Do the hazardous waste residues (sludges of liquids) exceed and standards are standards specified in 40 CFR 268, or where no treatment standards are established for a waste, the applicable prohibition levels?
		established for a waste, the appropriate
		Sludge Yes No Waste Code
		Supernatant Yes No Waste Code
		Supernatant ies was recidues:
	8.	Provide the frequency of analyses conducted on treatment residues:
	•	

NA

9.	Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?
	Yes No
10.	Are sludge residues that exceed the treatment standards and/or prohibition levels removed adequately on an annual basis?
	Yes No Comments
	a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
	Yes No
	b. Are residues subsequently managed in another surface impoundment?
	Yes No
	c. Are residues treated prior to disposal?
	Yes No Comments
	If yes, are waste residues treated on-site or off-site?
	On-site Off-site
	Identify waste code and treatment method:
	Waste Code Treatment Method
11.	If supernatant is determined to exceed treatment standards, is annual throughput greater than impoundment volume?
	Yes No Comments

<u>Lano</u>	Disposar A //
1.	Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment such as landfills, surface impoundments, concrete vaults, or bunkers?
	such as landfills, surface impoundments, waste plite, or bunkers? units, salt domes/beds, mines/caves, concrete vaults, or bunkers?
	Yes No \
4	Note: Do not include surface impoundments addressed in D, Surface
	If yes, specify which units and what wastes each unit has received:
2.	Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These records must be maintained until facility closure
	Yes No
	or test the wastes
3.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?
	Yes No
	If yes, at what frequency?
	If prohibited wastes that exceed the treatment standards are placed in
4.	If prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment sometiment of the prohibited wastes that exceed the treatment of the prohibited wastes are prohibited wastes and the prohibited wastes are proposed with the prohibited wastes and the prohibited wastes are proposed wastes and the proposed wastes are proposed wastes and the prohibited wastes are proposed wastes and the probability have an approved wastes and the probability have an approved wastes are proposed wastes and the probability have an approved wastes are proposed wastes and the probability have an approved wastes are proposed wastes and the probability have an approved wastes are proposed wastes and the probability have an approved wastes are proposed wastes are proposed wastes and the probability have an approved wastes are proposed wastes and the probability have an approved wastes are proposed wastes are proposed wastes and the probability have an approved wastes are proposed wastes are proposed wastes and the probability have an approved wastes are proposed wastes are proposed wastes and the probability have an approved wastes are proposed wastes ar
	variances) [268.30(a)], does the factified case-by-case capacity extension
	no migration petition (268.6), all approved table 2 [268.44]? [268.5], or variance from treatment standards [268.44]?
	Yes No
5.	national capacity variance of the soft indicate
	Yes No Comments
	If yes, have the minimum technology requirements been met for all units
	receiving such wastes?
	Yes No
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E.

6.	Does the facility have notices [268.7(a)(3)] and records for disposed wastes that are subject to national capacity variances, case-by-case extensions [268.5], no migration petitions [268.6], or a variance from treatment standards?
	Yes No NA
7.	If the facility has a case by case extension, is the facility making progress as described in progress reports?
	Yes No NA
8.	Are restricted wastes placed in underground injection wells?
	Yes No List

LIST OF RESTRICTED WASTES

رنDES:

Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.

No asterisk = Soft hammer wastes.

<u>Underlined</u> = Potential California List applicability. Bold Print = Final third and newly listed wastes.

NWW = Non-wastewater

WW = Wastewater

	M.M. = MSZIGMSIGI		· · · · · · · · · · · · · · · · · · ·	Diam	Gen/Trans/Treat/Store/Disp .
	Gen/Trans/Treat/Store/Disp		en/Trans/Treat/Store/	∪1sр К037°	1 1 1 1
F001°	<u> </u>	F011°		K038*	1 1 1
F002*		F012°		K039*	
F003°		<u>F019</u>		K040°	
F004*		F024°		. K041	
F005°	<u> </u>	K001		<u>K042</u>	
F020*		K004		K043° .	
F021°		KOOS (NWW)*		K044*	
F022"		K007 (NWW)*		 K045 [▼]	1 1 1 1
F023°		K008 1_		K046	
F026*		K009°	<u> </u>	(NWW -	• 1 1 1 1
F027*		K010°		nonreactive) (NWW -	
F028*		KOII(NWW)"		reactive)	
Liquid Hazard	lous Wastes With:	(<u>WW</u>) _		(<u>ww</u>)	
As*		K013(NWW)*		K047°	
(500 mg/l)	·	(<u>WW</u>) -		K048°	
Cd* (100 mg/l)	\$1 1 1	(<u>ww</u>) -		K049°	
Cr VI*		(<u>W.W.</u>) - K015(WW)* -	1 1 1 1	Koso"	
(500 mg/l)		•	1 1 1 1	K051°	
Pb* :	1 201 / /	K016*	1 1 1	 K052	
(500 mg/l)		<u>K017</u>	1 1 1 1	K060(NWV	/)* <u>·/</u>
Hg" (20 mg/l)		K018°	1 1 1 1	(<u>w</u> w	
Ni*		K019* K020*	1 1 1 1	K061	
(134 mg/l)		K020 K021(NWW)*	1 / / 1	(NWW -	1 1 1 1
Se*	1 1 1 1	(WW)		(NWW -	
(100 mg/l)		K022(NWW)*	/ / / /	high zinc)	
Ti" (130 mg/l)		(₩₩)	1 1 1 1	(<u>ww</u>)	
pH" ≤ 2.0		K023*		K062°	
PCBs*		K024°	1 1 1 1	K069	
≥ 50 ppm		K025(NWW)	. / / /	/ (NWW -	No. 1 1 1 1
Hazardous V	Vastes with:	(<u>\\\\</u>		nonCaSO	41
HOCs" ≥ 1,000 mg/	1 / / /	K027°	1 1 1 1	(NWW - Caso ,)	1 1 1
≥ 1,000 mg/ ≥ 1,000 mg/		K028*	. / 1 1 1	(<u>ww</u>)	1 1 1 1
2 1,500 mg/ F006 (NWW		K029(NWW)	• / / /	/ K071*	
(AAA)		(<u>ww</u>)		<u>K073</u>	
F007*	1 1 1	. K030*		K083 (WY	V)
F008"		K031		K084	
F009*		- <u>K035</u>		K085	
Ford,	1 1 1 1	- K036*			
1 0 4 04		*****		•	•

_	en/Trans/Treat/Store/Disp	•	Gen/Trans/Treat/Store/Disp	•	Gen/Trans/Treas/Store/Disp
G	eni ilanal ilasel neorel amb	P005	1 1 1 1	P087	
186		P007	/ / / /	P089*	
NWW - Sol Wash)*	1 1 1	P008	1 / / /	P092	
(WW -			1 1 1 1	P094°	
Sol Wash)*		P010 P011		P097°	
(NWW -		P012		P098°	
Soi Sludge)		P013°	1 / / /	20 99°	
(WW - Sol Sludge)	1 1 1 1	P014		P102	
(NWW -		P015	, , , ,	P104°	
Caustic/Water		P016	1 1 1 1 1 -	P105	1 1 1 1
(<u>WW</u> -	\ 1 1 1 1	P018		P106°	
Caustic/Water		P020		P107	
K087*		P021°		P108	
K093°		P026		P109°	
K094°		P027	1 1 _ 1	P110	
K095 (NWW)*		P029*	/ /_ /	P111*	
(<u>WW</u>)		P030"	1 1 1 1	P112	
K096 (NWW)*		P036	, , , , , , , , , , , , , , , , , , , ,	P113	
(<u>ww</u>)		P037		P114	
<u>K097</u>		P039"		P115	
K098		P040°		P120	
K099"		P041*		P121*	
K100 (NWW)*		P043"		P122	
K101 (NWW -		P044"	1 / 1 - 1	P123	
low As)"		P048		U002	
(<u>NWW</u> -		P049		U003	
high As)		P050		U005	
(WW)*		P054		U007	
K102 (NWW -		P057		U008	
low As)"		P058	- 1 1 1	U009	
(<u>NWW</u> -	1 1 1 1	P059		U010	
high As)		P060		U011	
(WW)*		P062°		U012	
K103* '		P063		U014	
K104*		P066		UOIS	
K105		P067		U016	
<u>K106</u>		P068	1 1 1	U018	
K113* K114*		P069		U019	
K114 K115*		P070		U020	
K115 K116°		P071°		U021	
P001		P072		U022	
P001 P002	1 1 1 1	P074°		<u>U023</u>	
		P081		<u>U025</u>	
P003	<u> </u>	P082		<u>U026</u>	
P004	* <u>*</u>	P084			
		P085°		•	

	Gen/Trans/Treat/Store/Disp	•	Gen/Trans/Treat/Store/Disp	٠	Gen/Trans/Treat/Store/Disp
U028°		U102°		U170	
029		U103		U171	
J031	1 1 1 1	U105		U172	
<u>U032</u>		U106		U173	
U035	1 1 1 1 1	U107*		U174	
<u>U036</u>		U108		U176	
U037		U109		U177	
<u>U041</u>		U110		U178	
U043	/ / / /	U111		U179	
<u>U044</u>		U114		U180	<u> </u>
<u>U046</u>	/ / / /	U115		<u>U185</u>	
U047	/ / / /	U116		U188	
U049		U119	1 1 1 1	U189	
U050		U122	1 / 1 /	U190°	
UOS1		U124		<u>U192</u>	1 1 1
U053		<u>U127</u>		U193	1 / / /
U057	/ / / /	<u>U128</u>		U196	
U058°		<u>U129</u>	/ / /	U200	1 1 1
U059		<u>U130</u>	/ / / / -/	U203	
<u>U060</u>		<u>U131</u>		<u>U205</u>	
<u>U061</u>		U133		U206	
<u>U062</u>	1 1 1	U134		<u>U208</u>	
<u>U063</u>		U135	/ / / /	<u>U209</u>	<u> </u>
U064		U137		<u>U210</u>	
<u>U066</u>		<u>U138</u> ·		<u>U211</u>	1 1 1
<u>U067</u>		U140		U213	
U069*		<u>U142</u>		<u>U214</u>	
<u>U070</u>		U143		<u>U215</u>	
<u>U073</u>		<u>U144</u>		<u>U216</u>	
<u>U074</u>		<u>U146</u>	1 1 1 1	<u>U217</u>	1 1 1
<u>U077</u>		<u>U147</u>		U218	1 1 1
<u>U078</u>		<u>U149</u>		U219	1 1 1 1
<u>U080</u>		<u>U150</u>		U220 .	
<u>U083</u>	1 1 1 1	U151		U221°	1 1 1 1
U086		U154		U223°	
U087°		U155		<u>U226</u>	
U088*		U157		<u>U227</u>	1 1 1
U089		<u>U158</u>	1 1 1 1	<u>U228</u>	1 1 1 1
U092		<u>U159</u>		U235°	
		U161		U237	
U093		U162	1 1 1 1	U238	
U094		U163		U239	
U095		U164	1 1 1	U244	
U097		U165		U248	
U098	***	U163 U168		U249	
U099		U169	1 1 1		
U101		CTOR			

RCRA INTERIM STATUS INSPECTION FORM

744	13/5	1990
Facility Name: American Steel Foundates Date of Inspection Thu	3 0/0/	
TARK TARK DOUGH	1-497-	587
CFB/CJ/CG / Thomas (1)	823-61	50 Cat
County: MAHONING FREIITY FROME F		Facili
Facility Contact: Bill HEESTAND, Safety & ENV. Sapurate Facility Contact Phone #:	-	
Facility Contact: Bill HEES MOD, Manager of Quality & Safety Equipment #: - Chuck Budd, Manager of Quality & Safety Equipment #: - Chuck Budd, Manager of Quality & Safety Equipment #: - Chuck Budd, Manager of Quality & Safety Equipment #:	y BRADI	NAY E
Inspector(s) Name(s): Ahmed Mustafa, OHD EPA **ENV. Affairs & Terr **Kri'S CODER, Ohio EPA	7 10.1.0	ENG
ANIS CODER) CHES		
CTATIC Storage	Disposal	X
STATUS Cond. Ex. SQG SQG Generator Transporter Treatment Storage		
ACTIVITIES Testment treatment treatm	nt	
Containers Tanks Surface Impoundments Intilleration, Waste pile Land treatment Landfill Groundwater monitoring X Waste pile Land treatment burner/blender		
Waste pile Land treatment Landtill Land Landtill Land Landtill Land Landtill Land Landtill La		
	Y/N/NA R	EMARK #
1. Does the facility produce "discarded materials" as defined in	N	
1. Does the facility produce discarded materials denerated at 3745-51-02(A)? Discarded materials Generated at (oHD 981909418).	 -	
3745-51-02(A)? Discarded materials (of D 981909418). 2. Are they: Production Facility (of D 981909418).	. /	
	<u></u>	
treated prior to disposar/.		
b.Recycled? c. Inherently waste-like?(F020,F021,F022,F023,F026,F028)?		
If recycled or accumulated, treated or stored		
in the waste:		
a. Used in a manner constituting disposal?		
b. Burned for energy recovery? c. Reclaimed? (Refer to Table 1 of 3745-51-02)		
d Accumulated speculatively		-
4. Is the material recycled by being:		
a. Used or reused as an ingredient in an account on?		
make a product without prior rectametrical products? b. Used as an effective substitute for commercial products?		
b. Used as an effective substitute for commercial process from which it was generated c. Returned to the original process from which it was generated		
without prior reclamation as a substitution as a		
feedstock?		
· · · · · · · · · · · · · · · · · · ·		

		YMMA	
	Are Land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.	<u>N</u>	
	Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-50-40?	<u> </u>	
	If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?		
	If not accurate, has a Permit Change Request (PCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.	NA	· ·
9.	Is the facility operating in compliance with the terms and conditions of its HWFE permit?	-N	And the state of t
10.	Has the facility submitted a Part B?	<u></u>	15 HOURS
11.	Was advance notice of the inspection given? If so, how far in advance?	7	
	•		

* According To June 12, 1989 Inspection:

FOR ADISPOSAL OF DOOD Waste.

IN June 1982, ASF Requested USEPA WithDra PART A Application Based on their testing of waste Stream. USEPA Acknowledges Request in April 1983 Based on Information Submitted at that time.

Subsequent Sampling By USEPA CONFirmed Disposal of HAZandous Waste at this Facility.

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

LAC 3745-65-et seq. GZNERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B)

		Y/N/NA	REMARK #
1 .	Does the owner/operator (o/o) have a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by 3745-65-13(A)(1) (265.13(a))?	<u> </u>	anno vijo - carratu
2.	Does o/o have a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. [3745-65-13(B)] (265.13(b))	N	
3.	a. Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	<u>Y</u>	
	b. Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	<u> </u>	
IF F	BOTH 3A AND 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.		
4.	Does the facility have -	\mathcal{V}	
	 a. A 24-hour surveillance system, or b. An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2)) 	Y	gazzany, interesting the
5.	Does the facility have a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. [3745-65-14(C)] (265.14(c))	4	,
6.	a. Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	<u>N</u>	

Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use ъ. and according to other applicable regulations when not in use. [3745-65-16(B)(4)] (265.15(b)(4))

Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equip-7. ment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented 8. employee training records? (265.16(d)(e))

If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? 9. [3745-65-17] (265.17)

- Protection from sources of ignition.
- Physical separation of incompatible waste materials.
- "No Smoking" or "No Open Flames" signs near areas where b. c. Ignitable or Reactive wastes are handled.
- Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)

.c	3745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)		
		Y/N/NA	REMARK #
1.	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u> </u>	фефилипп
2.	Has there been a fire, explosion or non-planned release of waste at the facility? a. If yes, has the contingency plan been implemented?	<u>N</u>	
3.	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32) a. Internal alarm system? b. Access to telephone, radio or other device for summoning emergency assistance? c. Portable fire control equipment? d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	NA Y NA NA	· *
4.	and communications equipment tested and maintained as necessary. [3745-65-33] (265.33)	N	William Programme Control of the Con
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	<u> </u>	Radios
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	NA	

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If required due to the actual hazards associated with the waste,

has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and

the facility layout? [3745-65-37(A)] (265.37(a))

* Radios in Trucks.

7.

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))

NA __

L	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? $[3745-65-52(A)(B)(C)(D)(\Sigma)]$ (265.52):		v
	a. Actions to be taken by personnel in the event of an	_	
	b. Arrangements or agreements with local of state		<u>etc</u>
	c. Names, addresses and telephone numbers of the pro-	_	
	qualified to act as emergency coordinated on qualified to act as emergency coordinated on qualified to act as emergency coordinated on qualified description and outline of capabilities? physical description and outline of capabilities? E. If required due to the actual hazards associated with		
	the waste handled, an evacuation plan 132 1221117, personnel? [3745-65-52(F)] (265.52(f))?		enno en modern en
2.	Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)		
3.	Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)		.
4.	Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)		
5.	If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the implemented all or part of the notifications deemed necessary under		

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actions and made all of the notifications deemed necessary under

3745-65-56(A-J). (265.56(a-j))

* NO Contin GENCY PLAN & NO Emergency Coordinator
For This Site.

_AC 3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

Y/N/NA REMARK

- Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:
 - Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and method pertinent to such treatment, storage or disposal?

 [3745-65-73(B)(1)] (265.73(b)(1).
 Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?

c. The estimated (or actual) weight, volume or density of the waste material?

d. A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 37457 (Part 265, Appendix I, Table 2)

e. The present physical location of each hazardous waste within the facility?

f. Records of incidents which require implementation of the Contingency Plan?

g. FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))

h. Records of any waste analyses and trial tests required to be performed?

i. Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?

Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?

٧	1	N	/NA	KEMVEK	ŧ

	k.	Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?	see c Sechi	on.
2.	731	o/o submitted an annual (bienniel) Treatment-Storage- I Operating Report (by March 1) containing all of the ng information required under 3745-65-75 (265.75)?	N	
NOTE:	THE FO	LLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.	,)	
3.	Is one generat	tifests received by the facility signed and dated? copy given to the transporter, one copy sent to the cor within 30 days and one copy kept for at least 3 years?	<u>N</u>	
	a .	If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?	NA	*
	b. '	Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.	NA	1
4.		ny manifest discrepancies been reconciled within 15 days uired by 3745-65-72(B) (265.72(b)) or has the o/o submitted quired information to the Director/Regional Administrator?	NA.	
5.	If the	facility has accepted any unmanifested hazardous wastes		

from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the

Director/Regional Administrator within 15 days?

OAC 3745-66 CLOSURE AND POST-CLOSURE (40 CFR PART 265, SUBPART G)

)AC 37	45-00 0200000 12.12	Y/N/NA	REMARK #
<u>.</u>	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	4	
	 a. A description of how each hazardous waste management unit will be closed in accordance with 265.111. b. A description of how final closure will meet the requirements of 3745-66-11 (265.111). 		C-philipping and the state of t
	requirements of 3/43-00-11 (203.121). c. An estimate of the maximum amount of hazardous waste ever in inventory. d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures,	+	<u> </u>
	soils, and all hazardous waste residues. e. The year closure is expected to begin and a schedule for the various phases of closure.		Character Assessment of the Control
	closure with the performance standards including ground water monitoring, leachate collection, and run-off control.		Schwerzen-besterring-bressed
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))		
3.	Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	*
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	• •

* Closure has NOT been Initiated or its to

		Y/N/NA	HEMILY F
	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	NA	چىنىسىدى <u>ن</u>
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	NA	
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	NA	
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in accordance with OAC 3745-66-16?	MA	
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	e Now	5
10.	If closure was partial, list the regulated units which remain in use at the facility:	2_	
	post-closure plan	17 . /	
11.	If required, has the facility prepared a written post-closure plan [3745-66-18] (265.118)	7	
12.	Does the post-closure plan include: a. A description of proposed ground water monitoring? b. A description of planned maintenance activities? c. The name, address and phone number of person/office to contact during the post-closure period?		

		the owner/operator	submitted	to Tocar	1 1	
13.	For disposal facilities, b	ins the Control of the	within 60	days after	NA	
	a the state of the L	17 F G C C C C C C C C C C C C C C C C C C			/	
	certification of closure?	[3745-66-19] (203-200)	•			

- 14. Has the owner of the property on which a disposal unit is located recorded on the deed that:
 - The land has been used to manage hazardous waste and the type, quantity and location of waste?

 Land use is restricted pursuant to 3745-66-17?

[3745-66-19] (265.119)

	-	·	Y/N/NA	REMARK #
.•	following			
	a .	Run-on control capable of handling a 24-hr, 25-yr storm? [3745-68-02(A)] (265.302(a))	<u>~</u>	- ·
	ъ.	Run-off control capable of handling a 24-mi, 25-72 stolling		
	c.	If run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the large of the run-off is hazardous waste, is it managed in the run-off is hazardous waste, is it managed in the run-off is hazardous waste, is it is not the run-off is hazardous waste, is it is not the run-off is hazardous waste, is it is not the run-off is hazardous waste, is it is not the run-off is hazardous waste, is it is not the run-off is hazardous waste, is it is not the run-off is not		g.c.c.ciling
	d.	Are facilities associated with fundon and ran systems managed to maintain design capacity after rain systems [27/5-68-02(C)] (265.302(C))		anny pariments
	e.	Control of wind dispersal of hazardous waste? [3745-68-02(D)] (265.302(d))		Constitution of the Consti
2.	Surveyi [3745-6	ng and Recordkeeping. Does the operating record include: 8-09] (265.309)		
	a.	A map showing the exact location and dimensions of each ce [3745-68-09(A)] (265.309(a))		
	b.	The contents of each cell and the location of each mustate type within each cell? [3745-68-09(B)] (265.309(b))	<u></u>	***************************************
3.	is no l	itable or reactive wastes treated so the resulting mixture onger ignitable or reactive? [3745-68-12] (265.312(a)(b))	<i>-</i> /	
NOTE:	IF WAST	E IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT SIONS OF 3745-65-17 AND 3745-68-12(B) APPLY. (40 CFR 265.)	REQUIRE L7(b))	MENTS. IF

		AININY	<u>REMARK #</u>
4.	Does the owner/operator dispose of incompatible wastes in separate cells? [3745-68-13] (265.313) If not, the provisions of 3745-68-15 apply. (265.17(b)	NA	
5.	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? [3745-68-15] (265.315)	NA NA	*
6.	Are containers at least 90% full prior to placement in the landfill	· • <u>/ / / / · · · · · · · · · · · · · · · </u>	
7.	Is bulk or non-containerized liquid waste or waste containing treated so that free liquids are not longer present.	\underline{N}	
8.	[3745-68-14(A)] (265.314(A)) Are containers other than lab packs, ampules, batteries or capacitors holding free liquids placed in the landfill? capacitors holding free liquids placed in the landfill?	NA	
9	[3745-68-14(B)] (265.314(B)) removed, absorbed or otherwise eliminated? removed, absorbed or otherwise eliminated? Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/operator employed Method 9095 (Paint Filter Liquids Has the owner/ope	N	
10.	Are the special requirements for lab pack waste met? [3745-68-16] (265.316)	NA	
11.	Is a written closure/post-closure plan available for inspection at the facility? [3745-66-12] (265.112)	N.	
12.	Has the closure/post-closure plan been amended 60 days prior to any changes in facility design, or operation, or no later than 60 days after an unexpected event has occurred which has effected the closure plan? [3745-66-18(D)](265.118(d))	N	,
	- 51 -		

was in Bulk.

, placement in the Landfill

- Has the closure/post-closure plan been submitted to the Director/
 Regional Administrator 180 days prior to beginning closure?
 [3745-66-18(E)] (265.118(e))
- NA ___
- 4.. Does the plan contain information required in 3745-68-10? (265.310)
 - Is a closure cost estimate available?
- 16. Has closure begun?

Has the property owner attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under 3745-66-17(C) (265.117(c)) as required in 3745-66-19 (265.119(b))?

* No plan

	RCRA INTERIM STATUS INSPECTI	ON FORM		92	
	19 reduction	w)		\$ 12+3+5	100
	Name: American Steel FounDRIES 1 Date 1001 E. BROADWAY ATTE STREET HWFB	of Insp	ection_	6/010.0	110
Facility	Name: MINETTERN STEEL TOUTSTEEL HWFB 1001 E. BROADWAY ATTENTION TISEPA	# :	411 # -	. 0 - 0 4 1 0	
Address		111 20	UILLI IO	70/7/0	
	Facil	ity Pho	ne #:(2	16) 823 - 013	<u> </u>
County:	John DESCHI Plant Supervisor	i en e			(======================================
	y Contact: BILL HEES TAND, Suffy & ENV. Super Mercil	ity Con	tact Pho	one : Jame	(SXF. 206
Facility	y Contact: BILL HEES TAND, Solely & ENV. AT Said CHUCK RULD, Manager Quality ENV. AT Said	ty Equi	pment #	: The many	Cost y Doc
	or(s) Name(s): Ahmed A. Mustafa, ENV. Eng.	V4-	Terry 6	BRADWAY, F	neitity on
Inspecto	Kris Coder / Mark Burgman.	JA 4.7	- 0		
			erundu hil	2	
			Carlie Service	Andrew Ministry	THE RESERVE
STATUS	x. SQGSQGGeneratorX_TransporterTreat	ment	Storag	e_X_Disposar	Charles and the
LONG. E	TPS		477.12.57		· Alamanda (P. A. Gara)
Contain	TES ers X Tanks Surface Impoundments Incinerations Example 1	ion/Thei	mal tre	a cmerr	
12222 10 Sept. 1975		nonitori	ng	The second of the second	
Msed oi	l burner Hazardous waste fuel burner/blender				
0000 00				Y/N/NA R	EMARK #
22		dofined	in	-1*	
1. Do	es the facility produce "discarded materials" as	GELTHER	. خيث	N^	
37	45-51-02(A)?		- 1 in	:	= = §
2. Ar	e they:	ored. o	_	m10	# 14
	a. Abandoned(disposed; incinerated; accumulated, st	0100,	=4		
	treated prior to disposal)?				
	b.Recycled?	5.F028)	?		
	b.Recycled? c. Inherently waste-like?(F020,F021,F022,F023,F02	è		49	
3. 'If	recycled or accumulated, treated or stored befor				
re	ecycling, is the waste:				
	a. Used in a manner constituting disposal? b. Burned for energy recovery?				
	c. Reclaimed? (Refer to Table 1 of 3745-51-02)				
	d. Accumulated speculatively?				
Agricultur e e e Televisione	1 - 1 ha hoise.			1.	•
4. 15	s the material recycled by being. a. Used or reused as an ingredient in an industri	al proc	ess to	1	6.
	A STATE OF THE STA				
		. produc	ts?	-	
				1.	-
	c. Returned to the original process from without prior reclamation as a substitute for	a raw I	mterial	Y	.00
	feedstock?		8		7.5

- 7 -

* The Process of mixing sludge with Electric Archumace Dust is No Longer used.

** E

			4 0 000 00 00 00 V	
approj	and Disposal Restricted (LDR) wastes generated? If so, complete prists LDR checklist.	Y	*	
accor	ne facility submitted a Part A application to Ohio EPA in lance with OAC 3745-50-40?	<u>N</u>	diff.eggyammunt-tguna	
matio	s, is it complete and accurate and does it contain all infor- n specified in OAC 3745-50-41, -42, -43?	عب في المجاورة		
in ac	t accurate, has a Permit Change Request (PCR) been submitted cordance with 3745-50-51? If yes, what date was the PCR tted.	Contract of the Contract of th		
9. Is th of it	e facility operating in compliance with the terms and conditions s HWFB permit? he facility submitted a Part B?	¥		2000年1月1日 - 11日 -
11. Was a	dvance notice of the inspection given? If so, how far in	<u>N</u>	**	
* F	- Solvent Wastes XAND CALAFORNIA List	inerati	ed waste	
•	- The Insp	ection	, Was	

* * SINE ENTERY To conduct the Inspection was done with a Search Warrant. Officers Rick A. Perez and Timothy A. Swanson from the Office of the Sheriff of Stark County assisted in excuting the Search Warrant Conduct an adminstrative INSpection.

REMARKS. GENERAL INFORMATION.

Include list of wastes being generated/managed at the site and a brief description of site activity and waste handling.

Generated at the site, location. WASTE F. Solvents (Fool, Foos) : due to toluene and water mix; and tetrachloroethylene. These Solvents are used in Parts & Equipment claming This waste is Placed in 55 Gallon drums, which is Placed in Secondary Containments. There is Two Locations Whene Thes waste 15 accumulated. The first the Location is outside north of the power House and Stored , along with another Drum That is Labled waste oil. The second location is bouth of the BEE Building. The HAZ. waste Drums is a 160 seconds stored w/ a waste oil Drum Within a fight since January, 1990. * ELE ctric Arch BURNACE Dust (Doob-Doo8): This predomnantly codmining lead containing Dust, Wh is collected in a (30) cubic yard container, This container is sent to ENVIRGLE, conton, Ohio, It generated once every 10 days. * PART Cleaners (DOO1) is generated at time of Pick up by Safety Kleen, Kent. * SMOKE BATER DUST (DOOS) it is generated from Welding Operation when Borinaccumulates in a pan Then Stored in a 55 Gallon Drum. No Dipo:

of This Material Since January of 1990.

	5-52 GENERATOR REQUIREMENTS (40 CFR Part 262)	YININA	REMARK #
		V	*
1.	Have the wastes generated at this facility been evaluated as		· · · · · · · · · · · · · · · · · · ·
	required under 3745-52-11 (202.11)	-	± ± ± ± 5 ± 5 ± ± ± ± ± ± ± ± ± ± ± ± ±
	Does this facility generate any hazardous wastes that are excluded from regulation under 3745-51-04 (261.4)?		
3.	Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment [3745-65-01] (265.1(c)(9)) or via operation of an elementary	<u>eri errede</u>	
	neutralization unit and/or wastewattr	<u> </u>	Same and the same a
	[3745-65-01] (265.1(C)(1U))?		
	Is the generator classified as a Small Quantity Generator (SQG)	/.	
Ψ.	conditionally exempt 50%		
•	If so, complete appropriate checklist.		
5.	Does the generator meet the following requirements with respect to the preparation, use and retention of the hazardous waste manifest) B	
	off site have been accompanie	ed.	10 10 10 10 10 10 10 10 10 10 10 10 10 1
	a. All hazardous wastes shipped directly revised by a completed manifest using the most recently revised	ý	
			de la constitución de la constit
	b. The manifest form used contains all the information required by 3745-52-20 (262.20) and the minimum number	V	
	- · · · · · · · · · · · · · · · · · · ·		Name and Address of the Owner, when the Owner, when the Owner, where the Owner, which is the Owner, where the Owner, which is the Owner, which
;	disposal facility and has/will designate an alternate disposal facility or instructions to return waste in compliance	V	•
		,	
	initial transporter in compliance with 3,43 3	7	D ####################################
	(262.23)? The generator has complied with manifest exception (262.23)?	NA	
			5 COLUMN TO THE PROPERTY OF TH
	f. Signed copies of all hazardous waste managed are retained	· 🗸	•
	documentation required for exception account account and the second for at least 3 years as required by 3745-52-40 (262.40)?		
		,	
			•
			- Just Wast
	ASF.	to	Type
	ASF -4- Assumble Knowledge of waste and Previous T	esting	AIt is

definitally evaluated upon shippment to a TSD Facility for treatment. The TSD Facility conduct to testing to confirm Waste waste Analysis plan.

		A/N/NV	REMARK #
ó.	Does the generator meet the following hazardous waste pre-transport requirements:		uuunkiriskiristilireenutinis
	a. Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?		
	-b. Prior to offering hazardous waste for transport deless is each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required	<u> </u>	
end of the	by 3745-52-32 (262.32)? Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33		*
7.	(262.33)? Does the generator import or export hazardous waste?	-	enaments)
·	If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	<u>N</u>	<u> </u>
8.	If the generator elects to accumulate hazardous waste on-site in containers or tanks for 90 days or less without a hazardous waste facility installation and operation permit as provided under 3745-52-34 (262.34), are the following requirements with respect to such accumulation met:		
	 a. The containers or tanks are clearly marked with the words "Hazardous Waste"? b. The date that accumulation began is clearly marked on 	<u>N</u>	
	each container? (c. If the waste is accumulated in containers, the generator	SEE	Management 1 is che UK List
	* Doob/Doo8 Does not NEED A PLACE F-Solvent Waste Should have a R have it).	and, lacare	But ILASF Does
	-		

đ	d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage	-
e	e. If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by the process generating the following requirements met:	
	the process generating the waste as the process generating the waste as the following requirements met: 3745-52-34(C) are the following requirements met: 1. Quantities of waste accumulated do not exceed 55	
	Quantities of waste accumulated do gallons at any time?	
	2. Quantities of acutely hazardous waste do	
	accordance with e.l of e.l., about "Hazardous Waste"	
	or with other words identily the complying with	
•	OAC 3745-66-71, 3745-66-72, 3745-66-72	
	4. If the generator accumulates hazardous e.2, above, did of the amounts listed in either e.1 or e.2, above, did	
£	the generator comply with 3/4352534(1) within three (3) days and mark the container holding within three (3) days and mark the excess the excess accumulation with the date the excess	•
	accumulation began accumulating:	
	Has the generator accumulated hazardous wastes in excess of ninety (90) days?	4222
	Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?	
f	Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained offered for transportation number from the Administrator as required	√

a USEPA identification number from the Administrator as required

under 3745-52-12 (262.12)?

10.

11.

Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)

N ____

Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records?

[3745-52-34(A)(4)] (262.34)

N

. Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?

Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.

REMARKS, GENERATOR REQUIREMENTS

7 _

		sed. GENERAL FACILITY STANDARDS (40 CFR Part 265, SUBPART B) mass	
<u>(</u> <u>1</u>	745-65-et	sed. General 1	Y/N/NA	REMARK #
q 	analysi mation waste a	e owner/operator (o/o) have a detailed chemical and physical s of the waste material containing all of the inforwhich must be known to properly treat or store the strength stream of the strength	<u> </u>	
2.	analyti testing may afi	o have a written waste analysis plan which describes cal parameters, test methods, sampling methods, frequency and responses to any process changes that ect the character of the waste. [3745-65-13(B)]	N.	
	(265.1	3(b)) (January 1)		
3.	8	Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(A)(1)) entering the facility?	· X	
-	Ъ.	entering the facility? [3.45-65-14(A)(2)] Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (265.14(a)(2))	\	- Committee of the Comm
IF B	OTH 3A AN	D 3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.		
4.	Does t	he facility have -	Y	
	a. b.	A 24-hour surveillance system, or An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)] (265.14(b)(2))	Y	***************************************
5.	Does t Keep C and at	the facility have a sign "Danger-Unauthorized Personnel Dut" at each entrance to the active portion of the facility to ther locations as necessary. [3745-65-14(C)] (265.14(C))	· <u> </u>	
6.	£ . 8 .	Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. [3745-65-15] (265.15)	y	*
		- 23 -		

* The Operating Record Log began Feb. 6, 1990.

b.	Are areas subject to spills (i.e., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-16(8)(4)] (265.15(b)(4))
	Training Program in compliance

Has the o/o provided a Personnel Training with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documen employee training records? (265.16(d)(e))

If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (265.17)

Protection from sources of ignition.

Physical separation of incompatible waste materials. ħ.

"No Smoking - or No Open Flames signs near areas where Ignitable or Reactive wastes are handled.

Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b)

PolyPack Containers Which Contain 55 Gallon Drums, do not have tuse signs.

There is a possibility of F- solvent being mixed out oil At the Power House poly Pack container. & Samples was From Mucil & solvent Drum 124 + obtained for 7/2/90, which will confirm this Samples # ASF S#1 & S#2).

	745-65 PREPAREDNESS AND PREVENTION (40 CFR PART 265 SUBPART C)	Y/N/NA	REMARK #
	Is the facility operated to minimize the possibilty of fire, explosion, or non-planned release of hazardous waste? [3745-65-31] (265.31)	<u> </u>	
	Has there been a fire, explosion or non-planned release of waste at the facility? a. If yes, has the contingency plan been implemented?	<u>N</u>	
	If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32)	Y	
	 a. Internal alarm system? b. Access to telephone, radio or other device for summoning emergency assistance? 	Y	and the second s
	c. Portable fire control equipment? d. Water of adequate volume and pressure via hoses, sprinkler, foamers or sprayers?	<u> </u>	ACCUMANTAL PROPERTY OF THE PRO
٠			
4 a	Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33)	<u> </u>	and the second s
5.	If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34)	, <u> </u>	Radio's
6.	If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement of emergency or spill control equipment maintained? [3745-65-35] (265.35)	<u>N</u> _	AAAGIFB
7.	If required due to the actual hazards associated with the waste, has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards an the facility layout? [3745-65-37(A)] (265.37(a))	i <u> </u>	
	- 25 -	-	
	* The Fire Department Conduct a Walk Thru However	of the	facility o

agreements w/ STATE Emengency

8. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(B)] (265.37(b))



OA. 3745-65 CONTINGENCY PLAN AND EMERGENCY PROCEDURES (40 CFR PART 265 SUBPART D)

<u>7د جو 0</u>	45-65 CONTINGENCY PLAN AND ELECTRONIC	YININA	REMARK #
			<u> </u>
1.	Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the hazardous wastes (A. C.) (P.) (C.) (D.) (265.52):		
	facility? [3745-65-52(A)(b)(C)(D)(C))		
	a. Actions to be taken by personnel in the event of an emergency incident? Arrangements or agreements with local or state	<u>N</u>	*
	emergency authorities? c. Names, addresses and telephone numbers of all persons		**
	qualified to act as emergency cooldinated including location,		
	physical description and outline of Capazzai with	_	***
-	the waste handled, an evacuation plan 25 personnel? [3745-65-52(F)] (265.52(f))?	<u>N</u>	
2.	Is a copy of the Contingency Plan and any plan revisions maintain on-site and has it been submitted to all local and state emergenc service authorities that might be required to participate in the	ed 7	OEPA-ER Did NOTE RELPTURE COF
	execution of the plan? [3/43-03-35(11/12)]		will revised asp
3.	Is the plan revised in response to rule changes, <u>facility</u> , equipm and <u>personnel changes</u> or failure of the plan? [3745-65-54] (265.5		
4.	Is an emergency coordinator who is familiar with all aspects of soperation and emergency procedures who has the authority to imple all aspects of the Contingency Plan designated at all times (on-some on-call)? [3745-65-56(A-J)] (265.56)	ite /	
5.	If an emergency situation has occurred, has the emergency coording implemented all or part of the Contingency Plan and taken all of actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))	the MA	2 ·
	- 27 -		
	* ASF did not make agreements and arr	angen	ents with
	ohio EPA - ER (Emengency Authorities) and	Lo car	_ Authorities
	** Emergency Coordinator & Home & World World Were NOT Included in the contingency Exx No Evacuation Plan For Facility Person Storage Area, which appears the only applies deficient.		
	were not Included in the contingency	Plan	less Hum 90 des
*	XX NO Evacuation Plan For Facility Person	nel	at Drum
	Storage Area which appears the only appl	iabl	e area per
	is deficient.		

3745-65 MANIFEST SYSTEM/RECORDS/REPORTING (40 CFR PART 265, SUBPART E)

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT. STORAGE AND DISPOSAL FACILITIES.

facil.	the o/o maintain a written operating the o/o maintain a written operating the old maintain a written operation (265.73) which contains ollowing information:			
8.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and stored or disposed treatment, storage or disposal?		*	
ъ.	Common name, EPA Hazardous waste Identification	<u>_N</u>	*	
c.	The estimated (or actual), weight, volume of tourney	<u>N</u>		
d.	waste material? A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed if Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	<u> </u>	Address.	The Drum
е.	The present physical location of each mazardous was		Storey - Co	nea (c)
f.	Records of incidents which require implementation of the	NA		•
g .	FOR DISPOSAL FACILITIES, the location and deanties are each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document and cross-references to any pertinent manifest document	NA.	-	
h.	Records of any waste analyses and trial tests required	NA	, <u></u>	
i.	Records of the inspections required under (Congress Inspection Requirements)?			
ʻj.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6);(265.73(b)(6))?		a diperior perior and the second	

- 28 -

* A Tracking Log of the Quantity and description for 1990,

k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under OAC 3745-66 (Part 265 Subpart G)?

Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

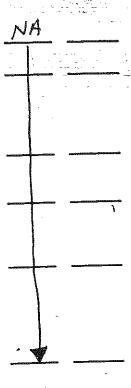
<u>N</u>____

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

- 3. Are manifests received by the facility signed and dated?

 Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years?

 [3745-65-71(A)] (265.71)
 - a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?
 - b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.
 - Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(B) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?
- 5. If the facility has accepted any unmanifested hazardous wastes from off-lite sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?



3	745-66 CLOSURE AND FOS1-CLOSURE (GG G.T. 1	Y/N/NA	REMARK \$
	Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (265.112)?	~	
	a. A description of how each hazardous waste management unit will be closed in accordance with 265.111.		transfer and the second
	b. A description of how final closure will meet the requirements of 3745-66-11 (265.111). C. An estimate of the maximum amount of hazardous waste ever		
	in inventory.		
	facility equipment containment systems, solutions		
	e. The year closure is expected to begin and a decimal of the second of		· · · · · · · · · · · · · · · · · · ·
	f. A description of other activities necessary closure with the performance standards including ground water monitoring, leachate collection, and		
	run-off control.		
2.	Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))		
	in the state of annicable)		
3.	for surface impoundment, waste pile, land treatment of the pirector/Regional Administrator units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))	NA	*
4.	Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to to the Director/Regional Administrator 45 days prior to	NA	

* CLOSUre plan has not been Written or has been intiated at this time.

beginning the closure process? [3745-66-12(D)] (265.112(d))

_	Within 90 days of receipt of the final volume of waste or Director's plan approval, if that is later, was all hazardous waste treated, removed, or disposed in accordance with the	NA	
	wasta treated, removed, of disposed approved plan? [3745-66-13(A)] (265.113(a))		enne Senement de la large de la companya
			47
5.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))		
	ranger and the control of the contro	<u> </u>	<u></u>
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of		
	Administrator, within sixty (60) this accordance and an closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)		
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in		
	accordance with OAC 3745-66-16?		. •
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	NONE	
	If closure was partial, list the regulated units which remain in		
10.	If closure was partial, list the regulation		
	use at the facility: WA		
i,			
11.	If required, has the facility prepared a written post-closure plant [3745-66-18] (265.118)	<u>NA</u>	
12.	Does the post-closure plan include:	. 1 Δ	
	ground water monitoring?		
	a. A description of proposed ground maintenance activities? b. A description of planned maintenance activities? c. The name, address and phone number of person/office	1	
	c. The name, address and phone number of prod? to contact during the post-closure period? - 31 -		
•			

1

- For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 60 days after NA 13. certification of closure? [3745-66-19] (265.119)
- Has the owner of the property on which a disposal unit is located recorded on the deed that:
 - The land has been used to manage hazardous waste and the type, quantity and location of waste? Land use is restricted pursuant to 3745-66-17?
 - [3745-66-19] (265.119)

DAC 3745-66 USE AND MANAGEMENT OF CONTAINERS (40 CFR PART 265, SUBPART I) Y/N/NA REMARK # Are hazardous wastes stored in containers which are: Closed [3745-66-73(A)] (265.173)? In good condition [3745-66-71] (265.171)? Compatible with the wastes stored in them [3745-66-72] C. (265.172)? Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a)) Are hazardous waste containers stored, handled and opened in ٥ ڏ a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b)) Is the area where containers stored inspected for evidence of , , leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]

Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)

б.

Are containers holding hazardous wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))

* A poly Pack container contains (2) 55 Gallon Drums, and acts as a secondary containment.

RCRA LA DISPOSAL RESTRICTION INSPECTIC

Facility:	AMERICAN Steel FOUNDRIES (ASF)
THE TON TO NO.	OHD 981 909 4/8.
Street:	10P1 E. Broadway St.
City:	Alliance State: 04 Zip: 4460/
Telephone:	(216) 823-6150
Owner/Operator:	
Street:	205 N.Michigan
City:	chicago state: IL zip: 60601
Telephone:	,
Inspection Date: Weather Conditions:	7 5+6,90 Time: 4:00 pm 2 9:00 am Cloudy Tempo. 80°F, Over Cast 72°F
Inspectors:	Name Agency/Title Telephone Ahmed Mustafa, OEPA-NEDO/ENV. Eng. (216)-425-417/ Mark Bergman, OEPA-NEDO/ENV. Eng. (216)-425-917 Bill HEGSTAMD, SAFety
Facility Representative:	_ SIII Recognition
f 3	
	Generate Transport Treat Store Dispose
F-Solvent	<u>X</u>
Dioxin	
California List	<u>X</u>
First Third	
Second Third	
i i	l Revised 10-20-89

100

INSPECTION SIMPLY

Processes That Generate LITR Wastes

- PARTS cleaning Solvents, consisting of To laune and tetrachboroethylene and Pentachloroethylene. The waste generated & coded as Fool & Foot

Waste generated & coded as Fool & Foot to clean

PARTS cleaning Naphthan, it is used that

Part and Remains captive in a product form until

Removed by Safety Kleen as a waste, that is code

Dool.

LDR Waste Management

Fool & Foot one accumulated in 55 Gallon Dra. and Sent to safety Kleen, New Castle, Ky For Reclaimation.

Dool is generated at the time Safety

Keen pickup the spent product from the Container,

It is sent to Safety Kleen, Kent, o hio.

ASF generates Now waste water Doos, Doob, & Doob
Which are NOT a subject of LDR, until of August 1990.

ASF USES LDR Forms and amplete test to thate

RCRA LAND DISPOSAL RESTRICTION INSPECTION

WASTE IDENTIFICATION

1.	Does	the facility handle the following wastes?
	a.	F001 through F005 spent solvents Yes X No _ List* Foo! { Foo5 only
	b.	Dioxin-containing Wastes
	c.	Yes No _X List* California List Wastes
		Yes X No _ List* Doo)
	đ.	First and Second Third Wastes
		Yes No _X List*
		Note: Please be aware of potential misclassification of wastes (i.e., California list/"soft hammer"/characteristic waste applicabilities).
2.	Does	the facility handle the following wastes (national capacity variances)?
1	a.	FOOl - F005 contaminated soil or debris resulting from a CERCLA response action or RCRA corrective action (effective date — $11/08/90$).
		Yes No \(Comments
<i>f</i>	b.	Dioxin contaminated soil and debris resulting from a CERCIA response action or a RCRA corrective action (effective date $-$ 11/08/90).
		Yes No X Comments
	c.	California list contaminated soil or debris resulting from a CERCLA response action or a RCRA corrective action (effective date — 11/08/90).
		Yes No _X Comments

à.	First Third wastes with the following waste codes: K048, K049, K050, K051, K052, or K071 (effective date - 08/08/90).
	Yes No X Comments
e.	First Third contaminated soil and debris which have a treatment standard based on incineration - K016, K018, K019, K020, K022, K024, K030, K037, K048-K052, K086, K087, K101, K102, K103, and K104 (effective date — 08/08/90).
	Yes No \(\frac{\lambda}{\text{Comments}}\) Comments
f.	Second Third contaminated soil and debris which have a treatment standard based on incineration — F010, F024, K009, K010, K011, K013, K014, K023, K027, K028, K029, K038, K039, K040, K043, K093, K094, K095, K096, K113, K114, K115, K116, P039, P040, P041, P043, P044, P062, P071, P085, P089, P094, P097, P109, P111, U028, U058, U069, U087, U088, U102, U107, U109, U221, U223, U235 (effective date — 06/08/91).
	Yes No X Comments

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A.

Trea	tability Group - Treatment Standards Identification
1.	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes X No NA
	If yes, check the appropriate treatability group.
	Wastewaters containing solvents (less than or equal to 1% total organic carbon (TOC) by weight) All other spent solvent wastes
2.	First and Second Third Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes No NAX
	If yes, list the waste code and check the correct treatability group.
	Waste Code Wastewater* Non-wastewater
•	
	\star Less than 1% TOC by weight and less than 1% filterable solids.
3.	California List Wastes: Has the generator correctly identified the required treatment technology [268.42]?
	a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)? Yes No NA
	If yes, specify the method:
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	1		For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated [40 CFR 761.70] or disposed of by other approved alternate methods [40 CFR 761.60(e)]? Yes No NA
			If an alternative method is used, specify the method and state whether the facility has received approval from the Regional Administrator or Director, Exposure Evaluation Division, for an exemption from the incineration requirement:
		c.	(HOCs) in total concentrations greater than of equal to 1,000 mg/Kg (except dilute HOC wastewater), is the waste incinerated in accordance with existing requirements of 40 CFR Part 264 Subpart 0 or 40 CFR Part 265 Subpart 0?
÷			Yes No NA
	4.	sta	s the generator mix restricted wastes with different treatment ndards? No Comments
		If '	yes, did the generator select the most stringent treatment standards 8.41(b), 268.43(b))?
Į J		Yes	No Comments
в.	Wast		nalysis
	1.	Doe	es the generator determine whether the restricted waste exceeds eatment standards or prohibition levels at the point of generation by:
		_	Knowledge of waste Yes X No
			List the wastes for which "applied knowledge" was used and describe the basis of the applied knowledge determination. * Dool: The use of MSDS Form S, which is given to ASF by Skety Kleen: * Fool & Foos: By knowledge of the process, then tested to confirm
			Revised 10-20-89

		Was all supporting data retained on-site, [268.7(a)(5)]?
		Yes X No
	_	TCIP Yes No NA X
		List the wastes for which TCLP was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results.
	_	Total constituent analysis Yes X No NA NA
		List the wastes for which total constituent analysis was used and provide the date of last test, the frequency of testing, and note any problems. Attach test results. Dool, Fool, Foos & a/3/1990 & As generated and shiped to safety Kleen.
	-	pH ≤ 2 Yes No _ NA _X
	v	List the wastes for which pH testing was used.
	-	Paint Filter Liquid Test Yes No NA _X List the wastes for which PFLT was used.
2	Does trea	the facility dilute the restricted waste as a substitute for adequate thent [268.3]?
	Yes	No NA
C.	Mana	egement.
	1.	On-Site Management
		Is restricted waste treated, stored for greater than 90 days, or disposed on-site?
		on-site? Yes X No _ comments F-Solvent & Stored &nsite Since Dec. 2
) }		If yes, the TSD Checklist must be completed.
		7 Revised 10-20-89

Off-S	Site Management
a.	Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?
	Yes X No (If no, go to b)
	If yes, identify waste code and off-site treatment or storage facilities:
	Waste Code Facilities Treat/Store Dool Safety Kleen, Kent, oh Stone
	Waste Code Dool Safety Kleen, Kent, oh Stone Fool Foos Safety Kleen, Newcastle, KY Treat
	Does the generator provide notification to the treatment or storage
-	facility [268.7(a)(1)]?
	Yes No
_	Does notification contain the following?
	EPA Hazardous waste number(s) Yes X No
l Mar	Applicable treatment standards Yes X No and prohibition levels
_ \$ *	Manifest number Yes X No
	Waste analysis data, if available Yes X No
b.	Does the facility ship any waste that meets the treatment standards to an off-site disposal facility?
	Yes X No (If no, go to c)
	If yes, identify waste code and off-site disposal facilities:
	Waste Code Doo / Kombustible Liquid Safety Kleen, Kent, Ohio
	Dool [combustible liquid] Safety Kleen, Kent, Ohio

2.

-	Does the facility provide notificate the disposal facility [268.7(a)(2)]	ion and ce ?	ertificat	ion to	
	Yes No				
	Does notification contain the follow	wing?			
	FPA Hazardous waste number(s)	Yes	No		
	Applicable treatment standards and prohibition levels	Yes	<i>N</i> o		
	Manifest number	Yes			
	Waste analysis data, if available	Yes	<i>N</i> o		·
	Certification that the waste meets treatment standards [wording in 268.7(a)(2)(ii)]	Yes			
c.	Is the waste subject to a nationwing extension (268.5), or no migration	ide variano n petition	ce, case (268.6).	-by—case ·	•
	162 —— 116 ——	no, go to			
_	If wes, does the generator provide receiving facility that the waste disposal [268.7(a)(3)]?	e notifica is not pr	tion to onibited	the off-site from land	
	Yes No				
_	Does the notification contain the	following	; informa	tion?	
	EPA hazardous waste number		5 <u> </u>		
	The corresponding treatment standand all applicable prohibitions	lards Yes	s 1	Jo	
	Manifest number	Yes	s 1	<i>y</i> o	
	Waste analysis data, if available	e Xe	s ¹	wo	
	Date the waste is subject to the prohibitions			<i>N</i> o	
đ.	Does the facility generate any F waste?	irst or Se	cond Thi	rd "soft ham	mer"
	Yes No /V/(If no,	go to 4)			
	······································	Rev	rised 10-	20-89	

	· · · · · · · · · · · · · · · · · · ·	· · · · · · · · · · · · · · · · · · ·
-	Does the generator provide the following receiving facility with each shipment	Of Wallet (1997)
`	(i) EPA hazardous waste number	Yes No
	(ii) Applicable prohibition [268.33(f), 268.34(h)]	Yes No
	(iii) Manifest number	Yes /10
	(iv) Waste analysis data, if available	Yes/ No
3. "	Soft Hammer" Demonstrations/Certification	s
a	Are any "soft hammer" wastes or treat ultimate disposal in a landfill or su	ment fesidues destined for urface impoundment?
	Yes No	
d	Has the generator attempted to locate recovery facilities that provide tree environmental benefit [268.8(a)(1)]?	and contract with treatment and atment that yields the greatest
•	Yes No	
·	Has the generator submitted a demonstration to document is available treatment [268.8(a)(2)]?	tration and certification to the ts efforts to locate practically
	Yes No	
	 If yes, did the generator submit the certification prior to first shipmen 	documentation and t? \
	Yes No	
ı	d. Does the demonstration contain the f	following information:
	A list of facilities and facility officials contacted?	Yes No
	Addresses	Yes No
·	Telephone numbers	Yes \No
	Contact dates	Yes No
	Certification statement	Yes No _
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	f	

NA

Attach a copy of the demonstration and certification.

	ACCACIT & COPT
e.	If there is no practically available treatment, has the generator included with the demonstration, a written discussion of why the generator was not able to obtain treatment or recovery for that waste [268.8(a)(2)(i)]?
	Yes No NA
	If yes, attach a copy of written discussion.
f.	Does the generator ship its "soft hammer" waste off-site for treatment?
	Yes No
	Describe the type of treatment and treatment facilities:
	Waste Code Type of Treatment Treatment Facility
	c in administration and
g ·	* certification to the receiving
	waste? Yes No
h.	a subsequent
11.	shipment of wastes to receiving radifferen
	Yes No NA
4. Re	ecords Retention
	in as all portifications.
Dx de	pes the facility retain on-site copies of all notifications, and certifications for a period of 5 years [268.7(a)(6)]?
Ye	es X No Comments LOK Notifications begun Dec , 1989
•	

		CLAV
		Corrective Action and CERCIA Response Action Waste NA
		Services Action and CERCIA Response Action Waste /V /
D.	RCRA_	COTTECTIVE ACTION AND STORY
	1	Has the facility disposed of contaminated soil and debris from a RCRA
	±• ·	Has the facility disposed of contaminated SOIT and contaminated SO
		impoundment?
		Yes No Comments
		Did the unit meet the minimum technology requirements (double liner,
	2.	Did the unit meet the minimum terminal terminal representation system, and ground-water monitoring)?
		leachate collection system, and grown
		Yes No NA Comments
	_	Dungage NA
E.	Treat	ment Using RCRA 264/265 Exempt Units or Processes NA
		\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
	l.	Is waste treated in RCRA 264/265 exempt units (1.c., 2011) furnaces, distillation units, wastewater treatment tanks, elementary
		furnaces, distillation with 3, was consistent of the second of the secon
		neutralization, etc.)?
		Yes No
		List types of waste treatment units and processes:
		Treatment Units and Processes
	•	Waste Code Type of Treatment
1		in an imite?
	2.	Are treatment residuals generated from these units?
		Yes No Comments
		If yes, the residues are subject to the LDR generator requirements.
1		If yes, the residues are surjust
	3.	Are these residuals further treated, stored for greater than 90
	٥.	days, or disposed on-site?
		Yes NA Comments
		If yes, the TSD checklist must be completed.
		If yes? the fab discourse was a

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

NA

Α.	Does the transporter accumulate waste for more than 10 days
n.	[268.50(a)(3)]?
	Yes No
	If yes, check the appropriate regulatory status:
	Interim status for storage RCRA permit for storage
	If no, describe inventory controls to ensure that wastes are not stored for more than 10 days:
`В.	Does the transporter mix, combine, or recontainerize wastes?
	Yes No
	If yes, list the restricted wastes that have been mixed.
!	

Is the waste treated in an exempt treatment process on site?

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RORA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A.

<u>Gerne</u>	eral Fa	cility Standards				
1.	Does :	the waste analysis plan	cover Part	: 268 requ	irements	7 ASF Does No.
		F-solvent (TCLP)*	Yes	No X	NA	Have a wast. Analysis Plan
		Dioxin (TCLP)		No		• ,
		California List , (PFLT and/or total cons	citment on	arjuru,		
		First & Second Third (TCLP and/or total cons				
		* TCLP= Toxicity Charac PFLT= Paint Filter Li	dimos reso	. (54) 0 107		
2.	Does wast	the facility obtain repeat and residues?	This D	one !	saftly k	leen prior to Shipper
	a.	What date was the waste	analysis	plan last	revised?	NA ·
	þ.	Are analyses conducted	on-site o	r off-site	e?	
		On-site Identify off-site lab:	V			Elgin, Ill
	c.	Are F-solvent and diox		ning waste	e analyzed	using
٠		Yes No X NA				

		d.	Are California List wastes analyzed using the appropriate analytical method (PFLT filtrate for metals and cyanide; total constituent analysis for corrosive wastes, PCBs and halogenated organic compounds (HOCs).
			Yes _X No NA
		e.	Are First Third and Second Third wastes analyzed using the appropriate analytical method for the specified EDAT* (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)? See Appendix B.
			Yes No NA
			* HTAT= best demonstrated available technology
	3.	[264	the operating records, including analyses and quantities, complete 4/265.73]? ** It is Bone on Drum Storage area (unpermittee polyfack containers which contained less than qo DAYS Drums(HAZundons).
		Yes	- No X go DAYS Drums (HAZundons).
	4.	and	operating records contain copies of the notification, certification, definition, definitio
		Yes	t until closure of unit. No Comments No Permitted Units on-Site.
ъ.	Sto	raq	(268.50)
	1.		prohibited wastes* stored on-site?
			No X (If no, go to C, Treatment.)
f	,	* P tha	Prohibited wastes are a subset of restricted wastes, i.e., they are use restricted wastes that are currently ineligible for land disposal FR 31208, August 17, 1988].
	-2.	_ If	yes, identify storage unit.
•			Tanks Containers Other (Identify inappropriate storage unit(s)
	3.	Are en	e all containers clearly marked to identify the contents and date(s) tering storage [268.50(a)(2)]?
i i		Ye	
į.			2 Revised 10-20-89

	No state of the wastes, and
4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage (264/265.73)?
	Yes No
5.	Do operating records agree with container labeling [268.50(a)(2) and 264/265.73]?
	Yes No NA Have tanks been emptied at least once per year since the applicable LDR
6.	regulations went into effect?
	Yes No NA that the wolling of waste removed
	If yes, do the operating records show that the volume of waste removed from tanks annually equals or is greater than the tank volume?
	Yes No
7.	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record [268.50(a)(2)]?
	Yes No NA
8.	Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect [268.50(c)]?
	Yes No NA /
	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?
	Yes No NA
	If yes, state how:
9.	or equal to 50 pfm being stored:
	a. In a facility meeting the TSCA criteria in 761.65(b)?
	Yes No NA
	b. More than one year [268.50(f)]?
	Yes No NA Revised 10-20-89
	/

Treat	tirent		€ Section 1		•
1.	Does the	facility tr nts?	eat restricted wast	tes other than i	n surface
	Yes	No	(If No, go to	D, Surface Impo	undments.)
2.			odes and treatment		
_,	Waste (atment Processes	
3.	Was dilu	tion used a	a substitute for	treatment [268.	3]?
	Yes	No/_ C	mments		
4.			in accordance with due from all treatr	an acceptable w pent processes [aste analysis 268.7(b)]?
	Yes	No \	Comments		
-	Have tre	eatment star	dards or prohibition	on levels been m	et?
	Yes	No	Comments		
5.	Does th	e facility s l facility?	nhip any vaste or t	reatment residue	e to an off-site
	Yes	No	ж <u> —</u>		
f -∤			reatment facility r ne disposal facilit	-1 (2001)	
	Yes	. No	checklist m	Generator port ist be completed	• 1
6.	If the treatme generat	waste or tr ent or stora tor notice a	eatment residue wil ge facility, has th nd certification re	ll be further man ne facility comp equirements [268	naged at a different lied with the .7(a)]?
	. Xes _	_ No			
•	•				

C.

₹.	Does the facility treat "soft hammer" wastes?
	Yes No (If no, go to 8.)
`\	a. If yes, is the waste treated in accordance with the generator's certification/demonstration [268.8(c)(1)]?
	Yes No
	b. Did the treatment facility certify that the "soft hammer" waste was treated in accordance with the generator's demonstration, [268.8(c)(1)]?
	Yes No
8.	Does the facility ship any "soft hammer" waste to an off-site treatment, recovery, disposal or storage facility?
	Yes No WA
	If yes, does the treatment facility send a copy of the generator's "soft hammer" demonstration and certification to the receiving treatment, recovery, disposal or storage facility along with its treatment certification [868.8(c)(2)]?
	Yes No NA
	Identify waste codes and off-site facilities:
	Waste Code Facility
9.	Are notifications, demonstrations, certifications (if applicable), and results of waste analysis prepared by the generators, kept in the operating record until facility closure [264/265.73(b)]?
	Yes No
/	

D.

2.

3.

4.

5.

Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 40 CFR 268, or where no treatment standards are

Yes ___ No ___ Waste Code _____ Sludge/ Waste Code ____ Yes ___ No ___ supernatant Provide the frequency of analyses conducted on treatment residues: 8.

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9.	Does the operating record adequately document the results of waste analyses performed in accordance with 40 CFR 268?
	Yes No
10.	prohibition levels removed adequately on an armin basis
	Yes No Comments
	a. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?
	Yes No
	b. Are residues subsequently managed in another surface impoundment?
	Yes No '
	c. Are residues treated prior to disposal?
	Yes No Comments
	If yes, are waste residues treated on-site or off-site?
	On-site Off-site
	Identify waste code and treatment method:
	Waste Code Treatment Method
	. If supernatant is determined to exceed treatment standards, is annual
11	throughput greater than impoundment volume?
	Yes No Comments

لقلف	DISPOSE:
l.	Are restricted and/or prohibited wastes placed in land disposal units such as landfills, surface impoundments, waste piles, land treatment units, salt domes/beds, mines/caves, concrete vaults, or bunkers?
	Units, Sait water, spen,
	Yes No \
	Yes NO \
	Note: Do not include surface impoundments addressed in D, Surface
	Impoundments.
	International Property of
	If yes, specify which units and what wastes each unit has received:
	II yes, specifi
2.	Does the facility's operating record contain notices, certifications, and "soft hammer" demonstrations from generators/storers/treaters? These
	"soft hammer" demonstrations from your records must be maintained until facility closure
	Yes No
3.	Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes (according to the waste analysis plan) to determine that the wastes
	(according to the waste analysis plant comply with the applicable treatment standards [268.7(c)]?
	Yes No
	If yes, at what frequency?
	the treatment standards are placed in
4.	If prohibited wastes that exceed the treatment standards are placed in land disposal units (excluding wastes subject to national capacity land disposal units (excluding wastes subject to national capacity land disposal units (excluding wastes subject to national capacity)
	land disposal units (exclusing water) an approved waiver based on
	variances) [268.30(a)], does the rate rate of case by-case capacity extension
	variances) [268.30(a)], does the facility have all approved water variances) [268.30(a)], does the facility have all approved the proved case by case capacity extension no migration petition [268.6], an approved case by case capacity extension [268.5], or variance from treatment standards [268.44]?
	[268.5], or variance/fidil treatment states
	Yes No /
	Does the facility dispose of restricted wastes that are subject to a
5.	Does the facility dispose of restricted wastes provisions? national capacity variance or the "soft hammer" provisions?
	national capacity variance of the
	Yes No Comments
	If yes, have the minimum technology requirements been met for all units
	If yes, have the minimum technology requirements 2000 \
	receiving such wastes?
	Yes No
	e Revised 10-20-89

E.

6.		at are sul s [268.5]	bject to na , no migrat		and records for disposed variances, case-by-case 268.6], or a variance from
		No	NA		
7.	If the far	cility ha as descri	s a case by bed in pros	case extension ress reports?	n, is the facility making
		No	NA_		
8.	Are restr	icted was	tes placed	in underground	injection wells?
٠	Yes	No	List		,

LIST OF RESTRICTED WASTES

CUDES:

Asterisk (*) = U.S. EPA has established treatment standards or prohibition levels.

No asterisk = Soft hammer wastes.

<u>Underlined</u> = Potential California List applicability.

Bold Print = Final third and newly listed wastes.

NWW = Non-wastewater

WW = Wastewater

	- Im 15: 17:		Gen/Trans	/Treat/S	tore/Disp		Gen/Tra	ns/Tre	mt/St	ore/Disp
	Gen/Trans/Treat/Store/Disp	P0114	/ /	, ,	1	K037°				
F001°	*	F011°		1 1	/	K038"			1	1
F002°		F012*		, ,		K039*			1	
F003°		F019		<i> </i>	1	K040*	1	1	1	1
F004"		F024°				. K041			1	
F005°	<u> </u>	K001°		<u> </u>		K042		1	1	
F020°		K004				K043° .		1_	1	
F021*		K005 (NWW		1 1	1	K044°		1		
F022*		K007 (NWW)			K045"				1
F023°		K008	7			К046				
F026		K009"		!	1	(NWW -	* <i>1</i>	į	,	,
F027*		K010"		<u>, , , , , , , , , , , , , , , , , , , </u>		nonreactive)				
F028*		K011(NWW)	·			(<u>NWW - reactive</u>)	1	1_	1	
Liquid Hazare	dous Wastes With:	(<u>ww</u>)				(<u>ww</u>)	1	/		
As*		K013(NWW	<u> </u>	1 1		K047*	1	1	1	
(500 mg/l)		(<u>ww</u>)				K048*	1	/	7	1
Cd* (100 mg/l)	5.1 1 1 1	K014(NWW	· - /-			K049*	1	1	1	
Cr VI"		(<u>ww</u>)		/, 	1	K050*	1	1	1	
(500 mg/l)		K015(WW)			7	K051°	. 1	1	1	
P6"	1 1	K016"		1 1		K052*				
(500 mg/l)		K017	_ 	1 1		K060(NWW)* /	1	_1_	
Hg* (20 mg/l)	1 1 1 1	K018° ·	_ <u></u> -			(<u>ww</u>		1		
Ni*		K019°		1 1.		K061				
(134 mg/l)		K020*	\	1 1		(NWW -	. ,	1	<i>i</i> .	1
Se*	$t \rightarrow t - t$	K021(NWW	· · · · · · · · · · · · · · · · · · ·	1 1		low zinc)* (NWW -			<u> </u>	hun.com
(100 mg/l)		(<u>₩₩</u>		1 1	/ .	high zinc)"				
Ti" (130 mg/l)	<u> </u>	K022(NWW		1 1	- /	(<u>ww</u>)		1		
pH° ≤ 2.0		(WW) _	1 1		K062*				
PCBs*		K023°		1 .1		K069	1			
≥ 50 ppm		K024*	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	<u> </u>	/	- WWN)				,
Hazardous V	Wastes with:	K025(NWV		1 1		`nonCaSO	,)*/_	/_	/_	
HOCs"	, , , , , , , ,	.coar	J /			(<u>WWW -</u>	1	1	1	
≥ 1,000 mg/		K027*		1 1	 .	(TVV)				-1
≥ 1,000 mg/		K028°		1		(<u>ww</u>)			1	
F006 (NW 7		K029(NWV		, ,	/	K071*			/	
(<u>ww</u>		(<u>WW</u>)	<i></i>		/	<u>K073</u> K083 (₩₩	·/		/	
F007*		K030*			·/	•			i	
F008*		<u>K031</u>		1 1		K084				
F009°		K035		1 /	/	K085	<u> </u>			
FOIQ*		K036°		<u></u>			_			

Ge	n/Trans/Treat/Store/Disp		Gen/Trans/Trest/Store/Disp		Gen/Trans/Treat/Store/Disp
		P005		P087	- Annual Control of Control
*^786 {WW ~		P007		P089"	
ool Wash) = _		P008		P092	
(WW -		P010	1 1 1 1	P094°	
Šoi Wash)"_		P011		P097°	
(NWW -	1 1 1 1	P012		P098*	
Sol Sludge)		P013°		P099°	
(WW - Soi Sludge)	1 1 1 1	P014	1 1 1 1	P102	1 1 1 1
(NWW -		P015	<u> </u>	P104°	
Caustic/Water_				P105	
(<u>ww -</u>		<u>P016</u> P018		P106*	
Caustic/Water)				P107	
K087"		P020		P108	
K093°		P021°		P109°	
K094° .		<u>P026</u>		P110	
K095 (NWW)*		P027		P111°	
$(\underline{w}\underline{w})$		P029*		P112	1 1 1 1
K096 (NWW)"		P030*	,		
$(\underline{w}\underline{w})$.		<u>P036</u>		<u>P113</u>	
K097		<u>P037</u>		P114	
<u>K098</u>		P039"		P115	
K099*		P040°		P120	
K100 (NWW)*		P041*		P121*	
K101		P043"		P122	
(NWW - low As)*	1 1 1 1	P044"		P123	
(NWW -		P048		U002	
high As)		P049		U003	
(WW)*		P050		U005	
K102		P054		U007	
(NWW -	1 1 1 1	P057		U008	
low As)"		P058	· / / / /	U 00 9	
(<u>NWW</u> - high As)		P059		U010	
(WW)*		P060		U011	
K103*		P062*		U012	
K104"	/ / / /	P063*		U014	
K105		P066		U015	
K106	<u> </u>	P067		U016	
K113*	/ / / /	P068		U018	
K114*	1 / / /	P069		U01 9	
K115*		P070		U020	
K116°		P071*		U021	
P001		P072		U022	
		P074°		<u>U023</u>	
P002		P081		<u>U025</u>	
P003		P082	/ / / / /	U026	
<u>P004</u>	4	P084			
			1 1 1 1		
		P085°			

	Gen/Trans/Treat/Store/Disp	•	Gen/Trans/Treat/Store/Disp		Gen/Trans/Treat/Store/Disp
U028*	1 1 1 1	U102°		U170	
` <u>129</u>		U103		U171	
 _J\$1		U105		U172	
<u>U032</u>		U106		U173	
U035		U107°		U174	
U036		U108		U176	
U037		U109	1 1 .1 .1	U177	
U041		U110		U178	
<u>U043</u>		U 111		U179	
<u>U044</u>	/ / /	U114		U180	
<u>U046</u>		U115 ·		<u>U185</u>	
U047		U116		U188	
U049		U119		U189	
U050		U 122		1180°	
U051		U124	/ / / /	<u>U192</u>	
U053		<u>U127</u>		U193	
U057	/ / / /	<u>U128</u>	1 / / /	U196	
U058*			1 1 1 1	U200	
U059		<u>U130</u>		U203	
<u>U060</u>		<u>U131</u>		<u>U205</u>	
<u>U061</u>		U133		U206	
<u>U062</u>	1 1 1 1	U134		<u>U208</u>	
U063		U135		<u>U209</u>	
U 064		U137	1 1 1 1	<u>U210</u>	
<u>U066</u>		<u>U138</u>	1 1 1	<u>U211</u>	1 / /
<u>U067</u>	. / / / /	U140		U213	
U069*	/ / / /	<u>U142</u>		<u>U214</u>	
<u>U070</u>		U143		<u>U215</u>	
<u>U073</u>	1-1//	<u>U144</u>		<u>U216</u>	
<u>U074</u>		<u>U146</u>		<u>U217</u>	
<u>U077</u>	/ / / /	U147		U218	
<u>U078</u>	. / / / / /	<u>U149</u>		U219	
U080	/ / / /	<u>U150</u>		U220 .	
U083	/ / / /	U151		U221°	
U086		U154	1 1 1	U223°	
U087°		U155 .		<u>U226</u>	. <u> </u>
U088°	1 1 1 1	U157		<u>U227</u>	
U089		<u>U158</u>		<u>U228</u>	
U092	1 / / /	U159		U235*	
U093		U161		<u>U237</u>	
U094		U162		U238	
U095		U163		U239	
U097		U164		U244	
T098		U165		U248	
U099	* / / / /	U168		U249	
U101	/ / /	U169			

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility:	MERICAN	STEEL F	CUADRIES	6
U.S. EPA I.D. N	o: DHE	98190941	8	
Street: 10	01 E.	BROADWA	44	
City: Acc	IANCE	State: OA	//D Zip Coo	ie: 44601
Telephone:	(216) 8	23 -6150		
Operator:	SAME)		especially and the second seco	
Street:		1800 - 110 - 120 -		· ·
City:		State:	Zip Coo	le:
Telephone:	,		•	
Owner:	MSTED -	1 NDUSTRIE	13 1 110	
Street:	/			
City: C	HICAGO	State:	Zip Coo	ie:
Telephone:	1 6 0	`		
Inspection Date	: 17189 Time:	We	eather Conditions:	ARIARLE
Inspectors:	Name KEV.N BO	Affiliation NAC DEC	7 (216) 7	425-917
Facility Repres		CH	WEK RUVD, A BACH, ASF	4MSTED
	RCRA Stat	F-Solvent	LDR Status California List	First Third
Generator	*	<u> </u>		
Transporter				
Treater		<u>X</u>		
Storer				
Disposer				-,

INSPECTION SUMMARY

This inspection summary is based on analytical data from samples collected at ASF on June 9, 1989 during execution of an administrative search warrant. Our analysis of waste bils (five drum composite from an inventory of approximately 70 containers) has indicated the presence of chlorinated solvents and non-chlorinated solvents in excess of 3000 ppm. Based upon these data, use of two solvent parts washers, lack of manifests for spent solvents and our interviews of plant employees, ASF is in violation of GRC 3734.02(F) which prohibits treatment of hazardous wastes without an Ohio hazardous waste facility operating permit. Therefore, attached is a completed inspection form which summarizes ASF's compliance with standards applicable to generators and treatment, storage, disposal facilities.

RCRA treatment is broadly defined in BAC 3745-50-10 to include any process including physical mixing so as to render such waste

In May 1987, U.S. EPA filed a complaint in U.S. District Court against ASF alleging unlewful treatment (comingling) of hazaroous waste baghouse dusts with non-nazaroous clarifier sludge. Whereas this practice appears to have ceased, ASF's mixing of hazardous waste solvents with non-hazardous waste oils is fundamentally identical.

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

				Gen.		Store	Disp.	Trans
١.	<u>F-S</u>	olvent Wa	<u>stes</u>	Samanan alimbéhi.				
	1.	F001	en jaron en	X	¥			
	2.	F002		/	/	· <u></u>		***************************************
	3.	F003			/ <u></u>			
	4.	F004		-				
	5.	F005				,	**************************************	<u></u>
		Note:	Use Appendi misclassifyin			ther the fa	cility is	

1.	Liquid hazardous waste (including free liquids associated wit	:h
	any solid or sludge) that contains the following metals at	11/1
	concentrations greater than or equal to those specified	NA

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L					
Cadmium	100 mg/L					
Chromium VI	500 mg/L					
Lead	500 mg/L		(Table 1)			
Mercury	20 mg/L					
Nickel	134 mg/L	·		*		
Selenium	100 mg/L					
Thallium	130 mg/L			· _Y		

** ***	Liquid hazardous waste any solid or sludge) that concentrations greater the	contains f	ree cyanid	es at	/	
		Gen.	Treat	Store	Disp.	Trans.
			-			
3.	Liquid hazardous waste	that has a	pH of less	than or eq	ual to 2.0	NA
	 		The second of th	.:		
4.	Liquid hazardous waste than or equal to 50 ppm	n	ins PCBs at	concentra	tions greate	~ NA
	Does the facility m contains PCBs with	ix liquid hother type		s? ·	 NA	water have global provinces
	If yes, state reasons				****	
5.	Hazardous waste that co (liquids) or 1,000 mg/kg	ntains HO((solids)	Cs greater 1	than or equ	ual to 1,000	mg/L N/A
	Note (1): The prohibitio waste is also subject to t specific HOC.					
	Note (2): The effective greater than or equal to 8, 1987; the effective da or equal to 10,000 mg/L 1,000 mg/kg is Novembe	1,000 mg/I te for liqui and solid	and less t	han 10,000 ontaining) mg/L was HOCs great	July er than

First Third Wastes C.

Note: (1) (2)

The detailed description for waste codes are listed in Appendix C. EPA has promulgated the treatment standards for the following waste code with *.

		Gen.	Treat	Store	Disp.	Trans.
F006*	te pries La Applementa del	n en		******************************	**************************************	
F007		intelligence — comité La comité de la comité des la comité de la comité de la comité de la comité de la comité des la comité de la comité destruite de la comité destruite destruite de la comité de la	e na :	-		
F008	· · · · · · · · · · · · · · · · · · ·	- Alle Militaria de la compansión de la		-		***************************************
F009				,	<u></u> ,	
F019						
K001*		************************		-	-	
K004°		***************************************	4			
X008*						,
K011						
K013						
K014	: h				*****	
X015*						
K016*						
K017						
K018*		·			-	
K019*			4			
K020°						
K021*						
K022*						***
K024*						
K025*						
K030*						
K031	•					
K035				479000000000000000000000000000000000000		
K036*						
K037°			******************************			
K044°				c		
K045°						
K046°		**************************************	***************************************		-	
		5			Revise	d 9-26-88

		Gen.	Treat	Store	Disp.	Trans.
K047°	•			<u> </u>		-
K048°			-	***************************************		
K049°		منطاب الباليات	-			
K050*	raenalijo ir	-			***************************************	
K051*		*****				
K052*		e e e e e e e e e e e e e e e e e e e			***************************************	· · · · · · · · · · · · · · · · · · ·
K060*		All the second s	And the second s	- True	*	
K061*						***********
K062*						***************************************
K069*						·
K071*						
K073*		 				
K083*						
K084						
K085	A Section 1					
K086*					<u></u>	
K087*						
K099*	•					
K100*		•				
K101°						
K102*					-	-
K103°						*
K104*						
K106*					************	
P001		 		 	-	
P004						
P005	•					
P010						
P011						***************************************
P012			-			
P015	•					
P016			-			-
P018						

		Gen.	Treat	Store	Disp.	Trans.
P020					·	<u> </u>
P030						
P036				-		
P037						
P039			Colored Colore		<u> </u>	
P041					-	
P048		40.42.				40000000000000000000000000000000000000
P050					-	
P058						-
P059						
P063						
P068			·			
P069				<u> </u>		
P070						
P071	***					
P081			***			
P082						
P084						
P087		•				*****
P089						
P092						
P094		*****				
P097			******			
P102						
P105	•					
P108	•					
P110	•					
P115						
P120				-		
P122		***************************************				
P123				-	<u> </u>	
U007						<u> </u>
U009			`			

		Gen.	Treat	Store	Disp.	Trans.
U010			***************************************			***************************************
U012				- · · · · · · · · · · · · · · · · · · ·	***************************************	
U016		***************************************	****	(*************************************		
U018						
U019						**************************************
U022			-		3	
U029				***************************************		
U031		***************************************			••••••••••••••••••••••••••••••••••••••	
U036		-				
U037						-
U041				-		
U043		***************************************				
U044						
U046				-		
U050	`••					
U051			****			
U053						
U061						
U063		. —				
U064						
U066				-		
U067						
U074						
U077	·					
U078						
U086						
U089						
U103			***************************************		<u> </u>	
U105		**************************************				
U108		-	***************************************			
U115						
U122						
U124					*******	

		Gen.	Treat	Store	Disp.	Trans.
U129						
U130		e <u>trassamundamana</u>	AND THE PROPERTY OF THE PARTY O	4-5		C. C. C
U133	ulu ki pri dega neptus (e)	(110.0001111111111111111111111111111111				
U134		Personal Science Person				-
U137	v *	***************************************				
U151			Salver	***************************************	***************************************	-
			-1 (1) (1) (1) (1) (1) (1) (1) (1) (1) (1			
U154						
U155						
U157			***************************************			
U158						
U159		-		***************************************		
U171						
U177						
U180						
U185	• •					
U188	•		******		-	
U192	· ·					
U200					•	
U209		· —				
U210					•	
U211						
U219						
U220			***************************************			
U221					******	
U223						
U226						
U227						
U228						
U237						
U238			-			
U248			-	****		
U249					***********	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

	F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?
	Yes X NoNA
I	If yes, check the appropriate treatability group.
-	Wastewaters containing solvents (less than or equal to 1% TOC by weight) Pharmaceutical wastewater containing spent methylene chloride All other spent solvent wastes
	California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?
а	For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)? Yes No NA
	If yes, specify the method:
t	concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?
	Yes No NA If yes, specify the method and state whether the facility has
v	If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

3.	appropriate treatability group of the waste?							
	Yes No X NA							
w	If yes, check the appropriate treatability group.							
	Wastewater (less than 1% TOC by weight and less than 1% filterable solids) Nonwastewaters List the waste code and check the correct treatment standard group.							
	Waste Code Wastewater Nonwastewater							
B. <u>W</u> ₃	ste Analysis							
1.	F-Solvent Wastes							
	a. Does the generator determine whether the F-solvent waste exceeds treatment standards?							
	Yes No NA							
	How was this determination made? - NOT MADE							
	- Knowledge of waste							
	YesNo							
	If yes, is any supporting data available for review? Describe how this is adequate.							
	- TCLP Yes No							
	If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.							
SAL								

	0.	treatment standards upon generation [268.7(a)(2)]?
		Yes No NA If yes, specify the waste stream: Spent methylene Chioride
		If yes, specify the waste stream: Spent methylene chloride PLACHLOR ETHYLENE
5	c.	Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]? MIKED WITH WASTE OIL Yes No NA
	d.	How does the generator test F-solvent waste when a process or waste stream changes? DOSS NOT TEST F- SOLVENT - DOES NOT MANAGE AS HAZARDOUS WASTE
2.	Cal	ifornia List Wastes N
	a.	Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?
		Yes No NA
	b.	If the waste is determined to be a liquid according to PFLT, is an absorbent added to the waste?
		Yes No NA
		What type of absorbent is used? Check the types of waste to which absorbent is added. Liquid hazardous waste having a pH less than or equal to 2
		Liquid hazardous waste containing metals
		Liquid hazardous waste containing free cyanides
	c.	Does the generator determine whether the concentration levels (not extract or filtrate) in the waste equal or exceed the prohibition levels or whether the waste has a pH of less than or equal to 2.0 based on:
		- Knowledge of wastes
		Yes No NA

	- Testing Yes No NA
	If yes, list test method used:
d.	Does the generator determine if concentration levels in the PFLT filtrate exceed cyanide and metals concentration levels?
	Yes No NA
	- If yes, list test method used and constituent and concentrati levels that exceeded prohibition levels:
-	
e.	Does the generator dilute the waste as a substitute for adequate treatment [268.3]?
	Yes No NA
Fir	st Third Wastes: N/A
a.	Does the generator correctly determine the appropriate treatment standard of the waste?
	Yes No NA
	Note: The treatment standards for first third wastes are given i Appendix D.
b.	Does the generator determine whether the First Third waste exce treatment standards upon generation?
	Yes No Soft hamm
	If yes, specify the waste stream:
	How was this determination made?
	- Knowledge of waste

			•	TCLP									
						Yes	•	No	3	NA			
			•	Total Co	nstituen	t Analys	is						
	# (a)	100	,	1.60 GP _{1.00}	15	Yes	a to a Lag	No	-	NA	2. 2		
	3			Provide note any					acy of t	esting, a	nd		
								The second secon				_	
					,	100 m							
		с.		the gene ment [268		lute the	waste a	s a subst	itute fo	r adequa	ite		
						Yes		No	-	NA			
		d.		does the m change		or test th	ne waste	when a	proces	s or wast	e .	â	
												_	
												_	
C.	Man	agem	ent										
	1.			lanagemen	ıt								
				waste or ored, or o	lisposed	on-site?			it stand	ards	8		
					A	_ Yes		No					
		If yo	es, the	TSD Che	ecklist n	nust be c	omplete	ed.					
2	2.	Off-	Site N	Manageme	nt								
5		1.	treat	the gene	daede te	an off-	site tre	atment c	17	0050	45	alla)	
,			Stora	ge facilit	y:	Yes	X	No No	WA	tears	2016	FACIO	177
		ъ.		the gene	rator pr	ovide no	tification	on to the					
						Yes							
						1.1	/ `			Revise	d 9-26-	88	

•	Does notification contain the following?	DOES	PROVIDE
	EPA Hazardous waste number(s)	Yes	•
	Applicable treatment standards	Yes Yes	No
:	Manifest number	Yes	No
	Waste analysis data, if available	Yes	No
	Identify off-site treatment or storage faci	lities: <u>WA</u>	STE OIL
	FACILITY - UM	<u> TKNOWA</u>	
	Does the generator ship any waste that m treatment standards to an off-site disposa	eets the I facility?	
	Yes No		
	Does the generator provide notification a certification to the disposal facility [268.]		
	Yes No	NA	
	Does notification contain the following?	NA	
	EPA Hazardous waste number(s)	Yes	No
	Applicable treatment standards	Yes	No
	Manisest number	Yes	No
	Waste analysis data, if available	Yes	No
	Certification that the waste meets treatment standards	Yes	No
	Identify off-site land disposal facilities:		
	identify off-site land disposal facilities.		
	Is the waste subject to a nationwide varia by case extension (268.5), or petition (268.	6)?	
	Yes X		NA
	If yes, does the generator provide notification receiving facility that the waste is not properties [268.7(a)(3)]?	ition to the online of the onl	
	Yes No	~/A	
	15		Revised 9-26-88

	i.	If yes, does the notification contain th	ne following inform	nation? N/F
		EPA Hazardous waste number	Yes	No
	٠	The corresponding treatment standard and all applicable prohibitions	s Yes	No
		Manifest number	Yes	No
•		Waste analysis data, if available	Yes	No
		Date the waste is subject to the prohibitions	Yes	No
	· j.	Does the generator retain copies of all a period of 5 years?	notices and certifi	ications for
		· · · · · · · · · · · · · · · · · · ·	Yes	No
D.	<u>Demonstr</u>	ation and Certification "Soft Hamme	r" Wastes ~/A	7
	a.	Has the generator attempted to locate and recovery facilities that provide tregreatest environmental benefit [268.8(a	eatment that yields	
			Yes	No
	ъ.	Has the generator submitted to the Re demonstration and certification contait to document its efforts to locate pract	ning the following	information
		A list of facilities and facility officials contacted?	Yes	No
		Addresses	Yes	No
		Telephone Numbers	Yes	No
		Contact dates	Yes	No
		Attach a copy of the demonstrati	on and certification	n
-	· c.	If the generator has determined that the treatment for its wastes, has it sent do demonstrating why it was not able to for the waste? Yes	cumentation to EP obtain treatment or	A
		If yes, attach a copy of written discus	sion.	

		Deseils	Yes Yes		facilities	
		Describe	the type of treatment	ing tiestment	120111100	
	1	· · · · · · · · · · · · · · · · · · ·			······································	
	•		auromat (1917) (1918)			
	c.	Did the	generator send a copy of ceiving facility with the	f its demonstr e first shipme	ration and int of wast	certificatio e?
		de s	Xes	No		
	f.		e generator provide cert t of wastes?	ification with	each subse	equent
			Yes	No		
	g.	Does the	generator provide the g facility with each shi	following notion production for the second contract of wast	ification to e?	the
		(i)	EPA Hazardous wast	e number	Yes	N
		(ii)	Manifest number	****	Yes	N
		(iii)	Waste analysis data, if available		Yes	N
	h.		e generator retain copies		s, demonsti	rations, and
			Yes	No		
(i.c	, boil	ers, furna	RCRA 264/265 Exempt I ces, distillation units, we elementary neutralization	astewater	NA	•
		treatmen	t residuals generated fr 264/265? Yes		ocesses ex	empt
	ŢĒ,	e liet tu	pes of waste treatment		ecsses:	
	11 2	es, list ty	pes of waste treatment	units and proc	.63363.	

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

rc	ces the waste analysiquirements [264.13 o	r 265.131?		WASTE	MARCY
0	F-solvent	Yes	X No	NA	Pun
. 0	California List _	Yes	No	NA NA	
Q	First Third	Yes	No	NA	
	oes the facility obtainstes and residues?			physical analyse	es of
	_	Yes .	No No		
a.	What date was th	ne waste analysi	/ s plan last revi	sed? NEVER	R DEVE
ъ.		ducted on-site of	r off-site?	JOT CON	JAUCTEE
			On-site	Off-site	
	Identify off-site	lab:	, •		
	Identify off-site	lab:	, •		
c.	Is F-solvent wast	e analyzed usin	g TCLP?		
c.	Is F-solvent wast		g TCLP?	NA	
c. d.	Is F-solvent wast	e analyzed usin Yes aste analyzed us the objective of visis for destruct	g TCLP? No ing the analytic the specified B ion technologies	cal method that DAT (i.e., total	is
	Is F-solvent wast Is First Third was appropriate for the constituent analystabilization/fixed	e analyzed usin Yes aste analyzed us the objective of visis for destruct	g TCLP? No ling the analytic the specified B ion technologieses)?	cal method that DAT (i.e., total s and TCLP for	is
	Is F-solvent wast Is First Third was appropriate for the constituent analystabilization/fixed Note: The appropriate appropriate for the appropri	Yes aste analyzed using the objective of the objective of the destruct of the destruction of th	g TCLP? No ing the analytic the specified B ion technologieses)? No ytical methods (third wastes wi	enl method that DAT (i.e., total and TCLP for	·

3.	Are the operating records, including analyses and quantities, complete [264.73/265.73]? NO DPERATING Yes X No
3. <u>Sto</u>	rage (268.50)
1.	Are restricted wastes stored on-site? — CANNOT BL Yes — No SUBSTANTIATES
	If no, go to C, Treatment.
2.	If yes, check the appropriate method.
	Tanks Containers
3.	Are all containers clearly marked to identify the contents and date(s) entering storage?
	YesNoNA
4.	Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?
	Yes No
5.	Do operating records agree with container labeling?
	Yes No NA
6.	Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?
	Yes No

	If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal? Yes No
	Yes No
	A SECTION OF THE PROPERTY OF T
	If yes, state how:
	Have tanks been emptied at least once per year since the applicable LDF regulations went into effect?
	Yes No NA
	volume of waste removed from tanks annually equals or is more than the tank volume? Yes No
	Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating
	record? Yes No NA
,	
,	
,	
	•
eat	ment_
	Does the facility treat restricted wastes other than in surface impoundments? Yes No

C.

Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?
Yes X No
Is dilution used as a substitute for treatment?
DILUTION IS SUBSTITUTE FOR PROP
Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record? Yes No NOT OFF5
Yes No NOT SFF-5
Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?
Yes No NA
If yes, does the treatment facility provide notification and certification to the disposal facility?
Yes No
If yes, does notification contain the following?
EPA Hazardous waste number(s) Yes No
Applicable treatment standards Yes No
Manifest number Yes No
Waste analysis data, if available Yes No
Certification that the waste meets the treatment standards Yes No

	3.	Does the facility ship any "soft hammer" waste to an off-site disposal facility?
		Yes No NA
		If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?
		Yes No
D.	Tre:	atment in Surface Impoundments N
		Are restricted wastes placed in surface impoundments for treatment?
		Yes No
	-	If no, go to E, Land Disposal.
	2.	If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?
		Yes No
	3.	If the minimum technology requirements have not been met, has a waiver been granted for that unit?
		Yes No NA
	4.	Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?
		Yes No
		Attach test results.
	5.	Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?
		Yes No

	3027 31722 TISEECTON 3033	<i>j</i>
	Mana: AMERICAN STEEL FOUNDRES Date of Enspection 6	18,9,12/89
facility	Mana: HMERICAN SIZEL POLINIORES	
Accrass:	7 5 6 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	(//6)7//0
	PLUANCE, ONIO 4460 (SEPA ID #: OHDTE Facility Phone #: (2	16 1823 -6150
C:::::::::::::::::::::::::::::::::::::		•
	Contact: PAUL LIMBACH Facility Contact Phot	10= 1216 823-615
Escility	CAUGH RUNG Safety Equipment #:	MARDWAT
	CHUCK RUCK	JAFETY GLASSED
Inspecto	or(s)Name(s): Krun Benfe	STEEL TOE W/ MET
•		TAR
	VICTORIA DEPPISCH - 6/8,9/89	21
STATUS		Dienosai
Cond. In	s. SQG SQG Generator Transporter Treatment Storage	D13 D0387
ACTIVIT	TES / (Manual trans)	-man :
	Total contract the contract the contract the contract that the contract the contrac	
	I andestrant Landfill Groundwater monitor-ma	•
Used oil	burner Hazardous waste fuel burner/blender	
	,	Y/N/NA REMARK #
•	in les en defined in	
1. Dos	es the facility produce "discarded materials" as defined in	√
374	45-51-02(A)?	
2. Are	e they :	
\$	e they : a. Abandoned(disposed;incinerated;accumulated, stored, or	
	treated prior to disposal)?	
1	b 3 1 a d ?	
(c. Inherently wasta-like?(F020,F021,F022,F023,F026,F028)?	
3. If	recycled or accumulated, treated or stored before	
70	ryrling, is the waste:	
;	a. Used in a manner constituting disposal?	
•	b. Burned for energy recovery?	
1	c. Reclaimed? (Refer to Table 1 of 3745-51-02)	
1	d. Accumulated speculatively?	
4. Is	the material recycled by being:	
	a. Used or reused as an ingredient in an industrial process to	
	a product without Drior Teclamaticu:	
	b. Used as an effective substitute for commercial products?	
	c. Returned to the original process from which it was generated	
	without prior reclamation as a substitute for a law materials	
	feedstock?	

Y WASTES

 Δ —

NA

NA NA NA

Are land Disposal Restricted (LDR) wastes generated? If so, complete appropriate LDR checklist.

6. Has the facility submitted a Part A application to Ohio EPA in accordance with OAC 3745-30-40?

- If yes, is it complete and accurate and does it contain all information specified in OAC 3745-50-41, -42, -43?
- 8. If not accurate, has a Permit Change Request (FCR) been submitted in accordance with 3745-50-51? If yes, what date was the PCR submitted.
- 9. Is the facility operating in compliance with the terms and conditions of its HWFB permit?
- 10. Has the facility submitted a Part B?
- 11. Was advance notice of the inspection given? If so, how far in advance?

Prepared manifests have been signed by the generator and

initial transporter in compliance with 3745-52-23(A)(1&2)

documentation required for Exception Reports are retained for at least 3 years as required by 3745-52-40 (262.40)?

The generator has complied with manifest exception reporting requirements in 3745-52-42 (262.42(a))? Signed copies of all hazardous waste manifests and any

ď.

f.

(252.23)?

COMPLIANCE ENALUATED FOR DODG/DODB WASTES

ONLY - OFF- SITE DISPOSAL OF BAGHOUSE

DUOTS,

** 5		•	Y/N/NA	REMARK #
6.		he generator meet the following hazardous waste pre-transport ements:		MANAGEMENT AND ASSESSMENT ASSESSMENT
	a.	Prior to offering hazardous wastes for transport off-site, the waste material is packaged, labeled, and marked in accordance with applicable DOT regulations [3745-52-30, 3745-52-31, and 3745-52-32] (262.30, 262.31, 262.32)?	\checkmark	
	b.	Prior to offering hazardous waste for transport off-site, each container with a capacity of 110 gallons or less is affixed with a completed hazardous waste label as required by 3745-52-32 (262.32)?	M	
	c.	Prior to offering hazardous wastes for transport off-site, the generator meets requirements for properly placarding or offering to properly placard for the initial transporter of the waste material in compliance with 3745-52-33 (262.33)?	-	
7.	Does t	he generator import or export hazardous waste?	4	
		If so, are the wastes handled in accordance with the requirements of 3745-52-50 (262.50)?	4	4
8.	<u>contai</u> facili 3745-5	generator elects to accumulate hazardous waste on-site in ners or tanks for 90 days or less without a hazardous waste ty installation and operation permit as provided under 2-34 (262.34), are the following requirements with respect to accumulation met:	.	
	a.	The containers or tanks are clearly marked with the words "Hazardous Waste"?	$\overline{\mathcal{N}}$	-
	ъ.	The date that accumulation began is clearly marked on each container?		
	с.	If the waste is accumulated in containers, the generator is complying with OAC 3745-66-70 to 3745-66-77? Complete Management of Containers checklist.	500	
		- 	ATTAC	
			CHE	CKLIST

d. If the waste is accumulated in tanks, the generator is complying with OAC 3745-66-90, to 3745-66-992 except OAC 3745-66-97(C) and 3745-66-991? Complete Storage and Treatment in Tanks checklist.

e .

NA

If the generator accumulates waste at or near the point of generation which is under the control of the operator of the process generating the waste as allowed by 3745-52-34(C) are the following requirements met:

 Quantities of waste accumulated do not exceed 55 gallons at any time?

Quantities of acutely hazardous waste accumulated do not exceed 1 quart at any one time?

3. If the generator is accumulating hazardous waste in accordance with e.1 or e.2, above, has the generator marked the containers with words "Hazardous Waste" or with other words identify the contents of the container and is the generator complying with OAC 3745-66-71, 3745-66-72, 3745-66-73(A), 3745-66-76, and 3745-66-77?

4. If the generator accumulates hazardous wastes in excess of the amounts listed in either e.1 or e.2, above, did the generator comply with 3745-52-34(A) (262.34(a)) within three (3) days and mark the container holding the excess accumulation with the date the excess accumulation began accumulating?

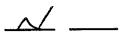


9. Has the generator accumulated hazardous wastes in excess of ninety (90) days?

10. Has the generator been granted an extension by the Director/ Regional Administrator for accumulation in excess of ninety (90) days?



11. Has the generator treated, stored, disposed of, transported or offered for transportation hazardous waste without having obtained a USEPA identification number from the Administrator as required under 3745-52-12 (262.12)?



* CANNOT BL SUBSTANTIATED

DUE TO LACK OF MANIFESTS,

LABELS WITH ACCUMULATION DATES

Does the generator provide a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) (265.16) including instruction in safe equipment operation and emergency procedures, training new employees within 6 months and providing an annual training program refresher course? [3745-52-34(A)(4)] (262.34)

 \sim

Does the generator keep all of the records required by 3745-65-16(D)(E) (265.16) including written job titles, job descriptions and documented employee training records?

[3745-52-34(A)(4)] (262.34)

11 522

Has the generator filed annual reports on or before March 1st of the next calendar year as required by 3745-52-41?

COVER LETTER

Does the generator comply with the applicable requirements for owners or operators of hazardous waste facilities? Complete "Preparedness and Prevention" and "Contingency Plan and Emergency Procedures" checklists.

<u> Σεε</u> ΑΓΤΑCHED CHCCKLISTS

REMARKS, GENERATOR REQUIREMENTS

Is the facility operated to minimize the possibilty of fire. explosion. or non-planned release of hazardous waste? [3745-65-31] (265.31) Has there been a fire, explosion or non-planned release of waste at the facility? If yes, has the contingency plan been implemented? If required due to actual hazards associated with the waste, does the facility have the following equipment: [3745-65-32(A)(B)(C)(D)] (265.32) Internal alarm system? Access to telephone, radio or other device for summoning emergency assistance? Portable fire control equipment? c. Water of adequate volume and pressure via hoses, sprinkler, d. foamers or sprayers? Is all required spill control and decontamination equipment, fire and communications equipment tested and maintained as necessary? [3745-65-33] (265.33) If required due to the actual hazards associated with the waste, do personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled? [3745-65-34] (265.34) If required due to the actual hazards associated with the waste, is adequate aisle space to allow unobstructed movement or emergency or spill control equipment maintained? [3745-65-35] (265.35)

If required due to the actual hazards associated with the waste,

has the facility attempted to make appropriate arrangements with local authorities to familiarize them with the possible hazards and

the facility layout? [3745-65-37(A)] (265.37(a))

7.

The same sections of the sections of the sections of the sections of the section of the section

THINA BEMARK :

Does the o/o have a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes which contains the following components for the facility? [3745-65-32(A)(B)(C)(D)(E)] (265.52):

a. Actions to be taken by personnel in the event of an emergency incident?

b. Arrangements or agreements with local or state emergency authorities?

Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator?

d. A list of all emergency equipment including location, physical description and outline of capabilities?

e. If required due to the actual hazards associated with the waste handled, an evacuation plan for facility personnel? [3745-65-52(F)] (265.52(F))?

NELID NOME ADDRESSES

/ __

Is a copy of the Contingency Plan and any plan revisions maintained on-site and has it been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan? [3745-65-53(A)(B)] (265.53)

PEVIEWED CERTIFIED MAIL RCCEIPTS

- Is the plan revised in response to rule changes, facility, equipment and personnel changes or failure of the plan? [3745-65-54] (265.54)
- 4. Is an emergency coordinator who is familiar with all aspects of site operation and emergency procedures who has the authority to implement all aspects of the Contingency Plan designated at all times (on-site or on-call)? [3745-65-56(A-J)] (265.56)

5. If an emergency situation has occurred, has the emergency coordinator implemented all or part of the Contingency Plan and taken all of the actions and made all of the notifications deemed necessary under 3745-65-56(A-J). (265.56(a-j))

N/A_

DAG STUBLIS USE AND MANAGEMENT OF CONTAINERS (40 OFR PART 165, SUBPART IN

		<u>7 'M/MA</u>	A many of the party of the part
	Are hazardous wastes stored in containers which are: a. Closed [3745-66-73(A)] (265.173)? b. In good condition [3745-66-71] (265.171)? c. Compatible with the wastes stored in them [3745-66-72] (265.172)?	**	
2.	Are containers stored closed except when it is necessary to add or remove wastes? [3745-66-73(A)] (265.173(a))	\checkmark	
3.	Are hazardous waste containers stored, handled and opened in a manner which prevents container rupture or leakage? [3745-66-73(B)] (265.173(b))	~	
4.	Is the area where containers stored inspected for evidence of leaks or corrosion at least weekly? [3745-66-74] (265.174) [documentation of inspections required under 3745-65-15 for TSDs]	_H	
5.	Are containers holding ignitable or reactive waste located at least 50 feet (15 meters) from the facility's property line? [3745-66-76] (265.176)	4	464799
6.	Are containers holding hazardons wastes stored separately from other materials which may interact with the waste in a hazardous manner? [3745-66-77(C)] (265.177(c))	/	·

N. South			YIMIMA	320152 }
A Company of the Comp	analysi mation wasta a	e owner/operator (o/o) have a detailed chemical and physical s of the waste material containing all of the inforwhich must be known to properly treat or store the s required by 3745-65-13(A)(1) (255.13(a))? O have a written waste analysis plan which describes	1	
	analyti	cal parameters, test methods, sampling methods. frequency and responses to any process changes that ect the character of the waste. [3745-65-13(B)]	~	
3.	a.	Would physical contact with the waste structures or equipment injure unknowing/unauthorized person or livestock entering the facility? [3745-65-14(A)(1)] (265.14(a)(1))	-	
	ъ.	Would disturbance of the waste cause a violation of the hazardous waste regulations? [3745-65-14(A)(2)] (255.14(a)(2))	+	•
I	30TH 3A AND	3B ARE NO, MARK QUESTIONS 4 AND 5 NOT APPLICABLE.	·	
4.	Does th	A 24-hour surveillance system, or An artificial or natural barrier and a means to control entry at all times [3745-65-14(B)(2)(a and b)]	/	
5.	# A.	(265.14(b)(2)) Le facility have a sign *Danger-Unauthorized Personnel Let at each entrance to the active portion of the facility other locations as necessary. [3745-65-14(C)] (265.14(c))		
5.	. a.	Has the o/o developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years, [3745-65-15] (265.15)	\prec	

b. Are areas subject to spills (i.a., loading and unloading areas, etc.) inspection daily when in use and according to other applicable regulations when not in use. [3745-65-15(3)(4)] (255.15(b)(4))

Has the o/o provided a Personnel Training Program in compliance with 3745-65-16(A)(B)(C) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course? (265.16(a)(b)(c))

N DOCUMENTED

IN GENERATOR

PART OF

COUER

LETTER

Does o/o keep all records required by 3745-65-16(D)(E) including written job titles, job descriptions and documented employee training records? (265.15(d)(e))

9. If Ignitable, Reactive or incompatible wastes are handled, does the facility meet the following requirements? [3745-65-17] (255.17)

Protection from sources of ignition.

Physical separation of incompatible waste materials.

c. "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.

d. Comingling of waste materials is done in a controlled, safe manner as prescribed by 3745-65-17(B) (265.17(b) X CANNOT BE EVAUATED -

Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements, has the refusal been documented. [3745-65-37(3)] (265.37(b))

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NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT. STORAGE AND DISPOSAL FACILITIES.

ANNINY SEMPSE :

Does the o/o maintain a written operating record at the facility as required by 3745-65-73(A) (265.73) which contains the following information:

a.	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date and	
	method pertinent to such treatment, storage or disposal? [3745-65-73(3)(1)] (255.73(b)(1).	
ъ.	Common name, EPA Hazardous Waste Identification Number and physical state (solid, liquid, gas) of the waste?	-
c.	The estimated (or actual) weight, volume or density of the waste material?	_
d.	A description of the method(s) used to treat, store or dispose of the waste using the EPA handling codes listed in Table 2 of OAC 3745? (Part 265, Appendix I, Table 2)	_
e.	The present physical location of each hazardous waste within the facility?	_
£.	Records of incidents which require implementation of the	-
g.	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document numbers? [3745-65-73(B)(2)] (265.73(b)(2))	
h.	Records of any waste analyses and trial tests required to be performed?	-
i.	Records of the inspections required under 3745-65-15 (265.15) (General Inspection Requirements)?	-
j.	Records of any monitoring, testing, or analytical data required under other Subparts as referenced by 3745-65-73(B)(6):(265.73(b)(6))?	

k. Records of closure cost estimates and post-closure (DISPOSAL ONLY) cost estimates required under CAC 3745-66 (Part 255 Subpart G)?

Has the o/o submitted an annual (bienniel) Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under 3745-65-75 (265.75)?

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE ONLY TO OFF-SITE TSDS.

3.

Are manifests received by the facility signed and dated?

Is one copy given to the transporter, one copy sent to the generator within 30 days and one copy kept for at least 3 years?

[3745-65-71(A)] (265.71)

a. If shipping papers are used in lieu of manifests (bulk shipments, etc.), are the same requirements met [3745-65-71(B)] (265.71(b))?

b. Are any significant discrepancies in the manifest, as defined in 3745-65-72(A) (265.72(a)) noted in writing on the manifest document.

Have any manifest discrepancies been reconciled within 15 days as required by 3745-65-72(3) (265.72(b)) or has the o/o submitted the required information to the Director/Regional Administrator?

If the facility has accepted any unmanifested hazardous wastes from off-site sources for treatment, storage, or disposal, has an unmanifested waste report containing all the information required by 3745-65-76(A) (265.76) been submitted to the Director/Regional Administrator within 15 days?

<u>SEL</u> SUBBAR CHECK
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Is a written closure plan on file at the facility which contains the following elements: [3745-66-12] (255.112)?

- A description of how each hazardous waste management unit will be closed in accordance with 265.111.
- b. A description of how final closure will meet the requirements of 3745-66-11 (265.111).
- c. An estimate of the maximum amount of hazardous waste ever in inventory.
- d. A description of steps taken to remove or decontaminate facility equipment containment systems, structures, soils, and all hazardous waste residues.
- e. The year closure is expected to begin and a schedule for the various phases of closure.
- f. A description of other activities necessary to ensure closure with the performance standards including ground water monitoring, leachate collection, and run-off control.

Has the closure plan (and post-closure plan, if applicable) been amended 60 days prior to any changes in facility design, processes, or closure dates or 60 days after an unexpected event occurs which affects the closure plan? [3745-66-12(C)] (265.112(C))

Has the closure plan (and post-closure plan, if applicable) for surface impoundment, waste pile, land treatment or landfill units been submitted to the Director/Regional Administrator 180 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

Has the closure plan (and post-closure plan, if applicable) for tank, containers storage or incinerator units been submitted to the Director/Regional Administrator 45 days prior to beginning the closure process? [3745-66-12(D)] (265.112(d))

YIMIMA REMARKS

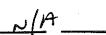
MA CLOSURE MAS NOT BEEN

> INITIATED AT THIS

		137 5	2 22.7 7 2 52	1
	• • •		<i>*</i>	
_			*****	

8	Within 90 days of receipt of the final volume of wasts or Director's plan approval. if that is later, was all hazardous waste treated, removed, or disposed in accordance with the approved plan? [3745-66-13(A)] (265.113(a))	~/A
6.	Was closure completed in accordance with the approved plan within 180 days after receipt of final volume of waste or approval of the plan, if that is later? [3745-66-13(B)] (265.113(b))	N/A
7.	Did the owner/operator submit to the Director/Regional Administrator, within sixty (60) days after completion of closure, certification by both the owner/operator and an independent registered professional engineer that the facility has been closed in accordance with the approved closure plan? [3745-66-15] (265.115)	N/A_
8.	Did the owner/operator submit to the local zoning authority and the Director/Regional Administrator a survey plant in accordance with OAC 3745-66-16?	N/A
9.	What permitted units at the facility have been closed in accordance with an approved Closure Plan?	<u>alone</u>
10.	If closure was partial, list the regulated units which remain in use at the facility:	
11.	If required, has the facility prepared a written post-closure plan? [3745-66-18] (265.118)	N/A
12.	Does the post-closure plan include: a. A description of proposed ground water monitoring? b. A description of planned maintenance activities? c. The name, address and phone number of person/office to contact during the post-closure period? - 31 -	
	· J	۲

13. For disposal facilities, has the owner/operator submitted to local land authorities and the Director a survey plat within 50 days after certification of closure? [3745-66-19] (265.119)



- 14. Has the owner of the property on which a disposal unit is located recorded on the deed that:
 - a. The land has been used to manage hazardous waste and the type, quantity and location of waste?
 - b. Land use is restricted pursuant to 3745-66-17? [3745-66-19] (265.119)

Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

		2 4	IIWFAD #
GENERAL INFORMATION		4	U.S. EPA I.D. # 0110017 497587
Facility: + Proposed Sizes A	TOWN ORIES	Address: LAKE PARK BLVD. AT HACK	K CIty: SERRING TWP.
State: 1)4/0		County: MANONING 1	elephone:
/ Nama \		INSPECTION PARTICIPANT(S) (TITLE) (Alarus Emberies) Mer. Quality and Emberoument	(Telephone) (216) 823-6150 ACHFERICS (312) 938-4016
1. Kevini Bonzo		INSPECTOR(S) ENVIRONMENTAL SCIENTIST	
2		INSTALLATION ACTIVITY	
Mark One	If the	site is'a TSDF, check the boxes indicating	which areas were reviewed.
Generator only (G) Transporter (T)	7' a	eneral Facility Standards, Preparedness nd Prevention, Contingency and Emergency anifests/Records/Reporting, Closure	/_/ Waste Piles SO3 /_/ Land Treatment D81
X/ TSDF only		ontainers 501	Landfills D80
	<u>_</u> / T	anks S02/T01	Chemical/Physical/ Biological TO4
G-TSDF	<u></u>	Surface Impoundments S04/T02	Groundwater Monitoring
/_/ T-TSDF		ncineration/Thermal Treatment	Post-Closure
/ / G_T_TSDF		a .	

- 1. Has the facility submitted a Part A to Ohio?
- 2. If "yes", is it complete and accurate?
- Has the facility submitted a Part B?
- 4. Was advance notice of the inspection given? If so, how far in advance? IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

N/A Remark #

REMARKS, GENERAL INFORMATION Include a brief description of site activity and waste handling.

#1 - PART A SUBMITTED IN NOV. 1980 FOR LANDEREL DISPOSAL OF DOOL WASTE.

> IN JUNE 1982, HSF REQUESTS USEPA WITHDRAW PART I APPLICATION BASED ON THEIR TESTING OF WASTE STREAM USEPA ACKNOWLEDGES REQUEST IN

APRIL 1983 BASED ON

/NFORMATION JUBINITED AT THAT

JUBSLAUENT SAMPLING BY U, S. EPA

CONFIRMS DISPUSAL OF HAZARDOUS WASTES

AT THIS FACILITY INFORMATION - 2

Revised 12/84

<u> 10</u>	CFR 265 (DAC 3745-65-et seg.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMEN	15	, <u> </u>	q.,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
		<u>Yes</u>	<u>No</u>	H/V	Remark #
	Subpart B: General Facility Standards				1
1.	The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]	1	<i>-</i>		•
2.	The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]		· <u>✓</u>	-	#1
3.	 a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(Λ)(1)] 	<u>/</u>	, , , , , , , , , , , , , , , , , , ,	. 1	Commence of the Commence of th
	b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) $[3745-65-14(\Lambda)(2)]$	1	/ 		
	IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".				
٩.	The facility has -		·		
	a) A 21-hour surveillance system, <u>or</u>		<u>~</u>	-	
	b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]	<u>.</u>	~		#2
5.	The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]		<u>~</u>	/;	<u> </u>
	and the second of the second o				·
	#1 - NO WASTE ANALYSIS PIAN DEVELOPED			i•	, 1
-	#2 - AccessiBLE FROM WEST, SOUTH SOUTHEAST HEACOCK		IA RD.	•	
•	GENERAL FACILITY STANDARDS - 1		•	Rev	Ised 12/84

- 6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years.

 (265.15) [3745-65-15]
 - b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]
- 7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]
- 8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]
- 9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]
 - a) Protection from sources of ignition.
 - b) Physical separation of incompatible waste materials.
 - c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.
 - d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]

#3 - NO INSPECTION PLAN DEVELOPED

14 -NO PERSONNEL TRAINING SPECIFIC TO

HAZARODUS WASTE MAN'AGEMENT

PENERAL PARTETTY CTAMBABBC

Yes No N/A Remark #

_ \ _ #3

_ ____

_ _ _ # _

_ _ _ # 4

_ _ _ ____

	RCRA INTERIM STATUS INSTITUTION				
		<u>Yes</u>	<u>No</u>	N/A	Remark #
•	Subpart C: Preparedness and Prevention				
	llas there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]				•
2.	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]			/	
	a) Internal alarm system.		·	<u> </u>	#
	b) Access to telephone, radio or other device for summoning emergency assistance.	<u> </u>			5
	c) Portable fire control equipment.			-¥-	
	A) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers	·		~	
	All required safety, fire and communications equipment is tested and maintained as pecessary: testing and maintenance are documented. (265.33) [3745-65-33]	<u> </u>	\preceq		#6
	If required due to the actual hazards associated with the waste material, personne have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]				#5
	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	<u> </u>		. 🗻	
6.	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]		• *************************************		/
	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]		_	_ <u> </u>	
-;	45-TRUCKS EQUIPPED WITH RADIOS (CHANGE FROM	K AZ	it 11	15PEC	7.02
مد	PREPAREDNESS AND PREVENTION - 1			Rev	/1sed 12/84
7	E-TESTING AND PREPAREDNESS AND PREVENTION - 1 MAINTENLANCE NOT DOCUMENTED				

· No

Subpart D: Contingency and Emergency

- 1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
 - a) Actions to be taken by personnel in the event of an emergency incident.
 - b) Arrangements or agreements with local or state emergency authorities. c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.
 - d) A list of all emergency equipment including location, physical description and outline of capabilities.
 - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(f)]
 - 2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] ____
 - 3. The plan is revised in response to facility, equipment and personnel changes or fatlure of the plan. (265.54) [3745-65-54]
 - 4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]
 - 5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J) ____

17 - alo CONTINGENCY PIAN DEVELOPED.

NO ASSIGNED EMERGENCY COURDINATOR (FOR THIS FACILITY)

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

- 1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:
 - a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
 - b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
 - c) The estimated (or actual) weight, volume or density of the waste material(s).
 - d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
 - e) The present physical location of each hazardous waste within the facility.
 - f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
 - g) Records of any waste analyses and trial tests required to be performed.
 - h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements Subpart B).
 - 1) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
 - j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

/	FF 8
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- _ _ _
 - _ _ _
- _ _ _ _
 - _____
 - _ _ _

•		<u>Yes</u>	No	N/A	Remark #
2.	The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]	**************************************	<u>/</u>		ttig
NOT	E: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE	ND DIS	POSAL	FACILI	TIES.
3.	Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [$3745-65-71(\Lambda)$		~	S	Sees of ellation well-bounded.
	a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]	and a special section	~	/	
	b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]	*************************************	¥	-	
4.	Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]		4		Serve-midseld-middless-flyfre
5.	If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]		<u>~</u>		0. 1/10 0 1/10 0
	#8- FACILITY DOES NOT MAINTAIN A WRITTE	· ~ ·	PER	ATIN:	g RiceRi
	# 9- ANNUAL REPORTS ARE NOT SUBMITTED				
	# 10 - MANIFESTS HAVE NOT BEEN USED FO	OR			
	SHIPMENTS TO THIS FACILITY				

-4	•				11	DEQUAC	y 70	5 EE	•
			RCRA_INTERI	M STATUS INSPEC		EVALUAT	ED	BY	,
			SUBPART F:	GROUND WATER M	ONITORING	CME UNDER	CUI	RRENTA	101
Гур	e of	facility: (check appropriately)				Yes	No	<u>Unknown</u>	
	a) b) c)	surface impoundment landfill land treatment facility						ı	
101	<u>E:</u>	UNDER INTERIM STATUS STANDARDS A MUNITORING REQUIREMENTS. PLEASE NEROM A WASTE PILE IS LEFT IN PLACE "LANDFILL" AND MUST MEET POST-CLOS	IOTE, HOWEVE AT CLOSURE	R, THAT IF ANY P , THE "WASTE PIL	IAZARDOUS WASTE _e" becomes a				
Gro	und	Mater Monitoring Program							
۱.		the ground water monitoring progra	ım revlewed	prior to site v	Istt?	37+4+ <u></u>	-		
	a)	Was the ground water program reviews the inspection?	ewed at the	facility prior	to				
2.	fac aqu	a ground water monitoring program llity's impact on the quality of gr ifer underlying the facility) been .90(a) [3745-65-90(A)]	round water	in the uppermost	e t		Service Service	Comments of the Comments of th	
3.	aqu	at least one monitoring well been ifer hydraulically upgradient from agement area? 265.91(a)(1) [3745-	the limit o	of the waste		Miles Street			
	a)	Are ground water samples from the of background ground water quality	uppermost a y and not af	quifer, represe	ntative acility				

(as ensured by proper well number, location and depths)?

		1 63	14:7	Olivin Mil Hart 1.00
۹.	Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 265.91(a)(2) [3745-65-91(A)(2)]		·	
	a) Do well number, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?		**************************************	•
5.	Nave the locations of the waste management areas been verified to conform with information in the ground water program?			4
	a) If the facility contains multiple waste management components, is each component adequately monitored?) Opensolistica	Aggregation	
5.	Do the numbers, locations, and depths of the ground water monitoring wells agree with the data in the ground water monitoring system program? If "No", explain discrepancies.			****
7.	Well completion details. 265.91(c) [3745-65-91(C)]			
	a) Are wells properly cased?			and discrete
	b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	direction of the second	dendered (SS)	
	c) Are annular spaces properly sealed to prevent contamination of ground water?	(2000-11-2000	400 km (20 m - 10 m)	And the same of th

		<u>Yes</u>	<u>No</u>	<u>Unknown</u>	<u>Waived</u>
3.	Has a ground water sampling and analysis plan been developed? 265.92(a) [3745-65-92(A)]			arraid.	
	a) Has 1t been followed?				
	b) Is the plan kept at the facility?				
	c) Does the plan include procedures and techniques for:				
	1) Sample collection?	•			
	2) Sample preservation?	******			
	3) Sample shipment?				
	4) Analytical procedures?				
	5) Chain of custody control?				
9.	. Are the required parameters in ground water samples being tested quarterly for the first year? 265.92(b) [3745-65-92(B)] and 265.92(c)(1) [3745-65-92(C)]		8-4		
	a) Are the ground water samples analyzed for the following:				
	1) Parameters characterizing the suitability of the ground water as a drinking water supply? 265.92(b)(1) [3745-65-92(B)(1)]	I <u>—</u>			
	2) Parameters establishing ground water quality? 265.92(b)(2) [3745-65-92(B)(2)]				
	3) Parameters used as indicators of ground water contamination? 265.92(b)(2) [3745-65-92(B)(3)]		****		
	(1) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each s obtained during the first year of monitoring? 265.92(c)(2) [3745-65-92(C)(2)]	e sample			
	200.00(0)(2)				

			. 22	110	<u>. </u>	
	(11)	Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 265.92(c)(2) [3745-65-92(C)(2)]	-			
b)	For fac	illities which have completed first year ground water sampling lysis requirements:			·	
	1) Hav	ve samples been obtained and analyzed for the ground water allty parameters at least annually? 265.92(d)(l) [3745-65-92(D)(l)]				
	are	ve samples been obtained and analyzed for the indicators of bund water contamination at least semi-annually? (4 replicate assurements per sample) 265.92(d)(2) [3745-65-92(D)(2)]				
	me	and the sample costs and the c	2			
c)	Were g well e	round water surface elevations determined at each monitoring ach time a sample was taken? 265.92(e) [3745-65-92(E)]		(m. j. cors		
d)	Were g the mo	round water surface elevations evaluated annually to determine whether nitoring wells are properly placed? 265.92(f) [3745-65-92(E)]		44473000000		
e)	of mon	was determined that modification of the number, location or depth itoring wells was necessary, was the system brought into compliance 65.91(a) [3745-65-91(A)]? 265.93(f) [3745-65-93(F)]				
llas pre	an out pared?	line of a ground water quality assessment program been 265.93(a) [3745-65-93(A)]				
a)	Does 1	t describe a program capable of determining:				
	1) Wh	ether hazardous waste or hazardous waste constituents have tered the ground water?				
	2) Th ha	e rate and extent of migration of hazardous waste or zardous waste constituents in ground water?				
		ncentrations of hazardous waste or hazardous waste nstituents in ground water?	уналежниково			

10.

		Yes	<u>No</u>	<u>Unknown</u>	<u>Walved</u>
•	b) After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 265.93(b) [3745-65-93(B)]		-		
	1) Here the results compared with the initial background means from the upgradient well(s) determined during the first year?		Service Control	t	
	(1) Was each well considered individually?				
	(11) Was the Student's t-test used (at the 0.01 level of significance?)	*****			
	2) Was a significant increase (or pH decrease as well) found in the:				
	(1) Upgradient wells (If "Yes", Compliance Checklist A-2 must also be completed.) [3745-65-93(C)(1)]	dell'orizondell'A			
	(11) Downgradient wells	***************************************	-		
	If "Yes", owner or operator must obtain, split, and analyze additional samples from the wells where a significant difference was detected. If the difference is confirmed, the Director should be notified in writing within 7 days and a ground water assessment plan within 15 days. [3735-65-93(C)(2) and (D)(2)(3)]				
11.	Have records been kept of analyses for parameters in 265.92(c) and (d) [3745-65-92(C) and (D)? 265.94(a)(1) [3745-65-94(A)(1)]		epopologica de la constanta de		
12.	Have records been kept of ground water surface elevations taken at the time of sampling for each well? 265.94(a)(1) [3745-65-94(A)(1)]	·			
13.	Have records been kept of required elevations in 265.93(b) $[3745-65-93(B)]$? 265.94(a)(1) $[3745-65-94(A)(1)]$	·			
, 14.	Have the following been submitted to the Director of the Ohio EPA: $265.94(a)(2)$ [3745-65-94(A)(2)]				
	a) Initial background concentrations of parameters listed in 265.92(b) [3745-65-92(B)] within 15 days after completing each quarterly analysis required during the first year?				

		163	NO	DIIKHOWH	Maisen
b)	For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplied been separately identified?				
c)	Annual reports including: $[3745-65-94(\Lambda)(2)]$			ı	
	 Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b) [3745-65-93(B)]? 	**********	teras-teritorio		
	2) Any significant differences from initial background values in upgradient wells separately identified?				
	3) Results of the evaluation of ground water surface elevations?	0-excita tion			

Comments: Subpart F

Subpart G: Closure and Post-Closure NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES. 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) d) A description of steps taken to decontaminate facility equipment. e) The year closure is expected to begin and a schedule for the various phases of closure. 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]

#11 - NO CLOSURE PLANS AVAILABLE

3. The Closure Plan has been submitted to the Regional Administrator/Director

180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]

Yes No

NZA

Remark #

		<u>,</u>	. 110	****	110.110.11
	Subpart H: Financial Requirements				
١,	The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]				1
	a) A closure trust fund, or		\checkmark		7/2
	b) A surety bond, or		~	Gracional	
	c) A closure letter of credit, or		~		
	d) A combination of financial mechanisms.	•	<u>~</u>	ومسيد	
2.	A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?		_		
3.	When was the most recent estimate made?		~		
4.	A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?	persolation		•	
C	When was the most recent estimate made?		~		上

REMARKS. GENERAL INTERIM STATUS REQUIREMENTS

H. 12 - NO FINANCIAL ASSURANCE ESTABLISHED

(NO LIABILITY COURRAGE ESTABLISHED)

(40 CFR 265.147, BAC 3745-66-47)

Yes . No N/A Remark # Subpart N: Landfills General Operating Requirements. Does the facility provide the following: NOTE: 1a, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981. a) Diversion of run-on away from active portions of the fill? (265.302(a)) [3745-68-02(A)] b) Collection of run-off from active portions of the fill? (265.302(b)) [3745-68-02(B)] c) Is collected run-off treated? [3745-68-02(B)] d) Control of wind dispersal of hazardous waste? (265.302(d)) [3745-68-02(D)] 2. Surveying and Recordkeeping. Does the operating record include: [3745-68-09] a) a map showing the exact location and dimensions of each cell? (269.309(a)) $[3745-68-09(\Lambda)]$ b) The contents of each cell and the location of each hazardous waste type within each cell? (269.309(b) [3745-68-09(B)] 3. Closure and Post-Closure a) Is the closure Plan available for inspection? Has this plan been submitted to the Regional Administrator? c) Has Closure begun? d) Is Closure cost estimate available by?

13 - OPERATING REGULARMENTS INCLUDE SPECIFIC DESIGN,
CONSTRUCTION, OPERATION AND MAINTENANCE CRITERIA

FOR RUN-OFF AND RUN-ON CONTROL AND FOR

LANDFILLS - 1 WIND DISPERSAL

CONTROL

Rev

Revised 12/84

,		Yes	. <u>No</u>	N/A	Remark #
4.	Special requirements for ignitable or reactive waste. (265.312(a)(B)				
	a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?	 	- Maria	<u> </u>	ı
NOTI	IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY. [3745-65-17]	3.			
5.	Special requirements for Incompatible Wastes.				
	a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply. [3745-65-17]	 		_	
6.	Special requirements for Containers:				
	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? (265.315) [3745-57-85]			\checkmark	Circle William Co.
7.	Special requirements for Liquid Waste.				
	Bulk or non-containerized liquid waste or waste containing free liquids is placed in a landfill having a liner and leachate collection and removal system meeting 264.301(a) requirements or is treated so that free liquids are no longer present. (265.314(a)) [3745-68-14(A)]		<u>~</u>	Wiesleise	<u></u>
8.	A written Post-Closure Plan is on file at the facility.				#11
9.	The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation. (265.118(b))	, ,	<u>~</u>	0+0+0-4+	
10.	The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure. (265.118(c))		~		
11.	The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Section 265.117(c) [3745-66-17(C)] as required in Section 265.120 [3745-66-10].		<u>~</u>	-	-

V. May 25 1988, 9:00 Am Date and Time of Inspection

RCRA INTERIM STATUS INSPECTION FORM

		IIWFAB #
GENERAL INFORMATION		U.S. EPA 1.D. # 0110 981 9094/16
Facility: Downson Street	Funders Address: 1001 E. BRINDWAY	City: ALCINARE
State: OHIO	Zip Code: 44601 County: STARK	Telephone: (2/6) 823-6/50
	INSPECTION PARTICIPANT(S)	(Telephone)
(Name)	(Title)	(21:) 823-6150
1. FAUL LIMBACH	WORKS ENGINEER	
2. CHARLES RUUD	MGR. QUALITY HON ENVIRONMENT	TAL MERHINS CULLY TO
1. Keyn Borza	INSPECTOR(S) ENURONMENTAL SCIENTIST,	THIO EPA (218) 425-9171
3.		
	INSTALLATION ACTIVITY	
Mark One	If the site is a TSDF, check the boxes indicating	g which areas were reviewed.
/X/ Generator only (G)	General Facility Standards, Preparedness	/_/ Waste Piles SO3
	and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure	/_/ Land Treatment D81
Transporter (T)	Containers SOI - TRANCAS FOR	/_/ Landf111s D00
/_/ TSDF only		/ / Chemical/Physical/
	/_/ Tanks S02/T01	Biological 104
G-TSDF	/_/ Surface Impoundments S04/T02	∠_/ Groundwater Honitoring
	/_/ Incineration/Thermal Treatment	// Post-Closure
/_/ G-T-TSDF		

- 1. Has the facility submitted a Part A to Ohio?
- If "yes", is it complete and accurate?
- Has the facility submitted a Part B?
- 4. Was advance notice of the inspection given? If so, how far in advance?

 IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

INFORMATION - 2

Remark #

No

<u>Ye :</u>

 $3/\Lambda$

40 CFR 262 (DAC 3745-52) GENERATOR REQUIREMENTS

١.	The hazardous waste(s) generated at this facility have been tested or are
	acknowledged to be hazardous waste(s) as defined in Section 261 and in
	compliance with the requirements of Sections 262.11. [3745-52-11(D)]

- 2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?
- 3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]
- 4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:
 - a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].
 - b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].
 - c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].
 - d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].
 - e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]

/	EAF DUST TESTED,
	 MANIFISTED
	AS HAZARUDUS
	WHITE





\checkmark	 	N.T. Zinc	C o

<u> </u>	 	

			162	NU	N/A	Remark #	
	The	generator meats the following hazardous waste pre-transport requirements:					
	a)	Prior to offering hazardous wistes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<u>/</u>	erinoisastemas	400/01/4/00/02/01/0	Con constant	
	b)	Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	Germanian est		<u> </u>		
	c)	The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<u>/</u>	·	er eren amen en	TRANSPUR PLACAROS ASF NE PENCAR	20
	Haz	ardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	#*************************************		<u> </u>	, pena	HM
1.	tan Sec	the generator elects to store hazardous waste on-site in <u>containers</u> or oks for <u>90 days</u> or less without a RCRA storage permit as provided under otion 262.34 [3745-52-34], the following requirements with respect to otion storage are met:					
	a)	The containers are clearly marked with the words "Hazardous Waste".	<u> </u>	,	-	Controllerio non advidete de la la	
	b)	The date that accumulation began is clearly marked on each container.	1	************			
3.	Sec equ wit	generator has provided a Personnel Training Program in compliance with tion 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe inpment operation and emergency response procedures, training new employees thin 6 months and providing an annual training program refresher course.			00 0 - 1-1 -1000-100	# 2	
€.	[37	e generator keeps all of the records required by Section 265.16(d)(e) 745-65-16(D)(E)] including written job titles, job descriptions and documented ployee training records (Section 262.34) [3745-52-34(A)(4)].				#2	

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

1 - WHEREAS THE MANIFESTS DO CONTAIN ALL THE

REQUIRED INFORMATION, ASF IS USING THE SEBRING DISPOSAL

FACILITY ID # ON AT LEAST TWO MANIFESTS DOCUMENT #9 + 10)

2 - THE PERSONNEL TRAINING REQUIREMENTS OF HOCFR 265.16 HAVE

DAC 3745-65-16 ARE SPECIFIC RUKES FOR

TRAINING PERSONNEL TO PROPERTY MANIFOL

HAZHROOUS WASTES. ASF MUST DEUCLOP

A TRAINING PROBRAM AND MAINTAIN REQUIRED

RECORDS AND NOB DESCRIPTIONS.

N/A Remark # Yes No Subpart C: Preparedness and Prevention 1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31] If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)] a) Internal alarm system. Access to telephone, radio or other device for summoning emergency assistance. c) Portable fire control equipment. d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers. RECID 3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33] 4. If required due to the actual hazards associated with the waste material, personnel INTERCOM AT have immediate access to an emergency communication device during times when SCALE HOJACH hazardous waste is being physically handled. (265.34) [3745-65-34] TO BAGHEVSLi 5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35] 6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility MISCUS SICH layout. (265.37(a)) [3745-65-37(A)] 7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]

Subpart D: Contingency and Emergency

					Subpart	: D: Col	nt indenci	G110 C11-1							
1.	- 11		1/01/01/01	(F)1 and G	gency Place of contains	an desig hazardo the foll	ined to mi ous wastes lowing cor	inimize haz s (265.51) mponents:		20 c	SPY	(a)		Spection P. Not	۱.
	a)	Actions t	o be taken	by persor	nel in t	the event	t Of all e	ncy author	ities.			\checkmark	J	IMERGENCE	4
	b	Arrangeme	ents or agr	eements W	ith local	of al	1 persons	ncy author	to act as		/			בנגסיקנ זא	,
	C') Names, ac	ddresses ar y coordinal	d telepho or.	ne number	LZ DI AI	1 persons	qualified			<u>/</u>				
	đ	14-4-0	f all emer	ency equi	pment in	cluding	location,	, physical	description	لـ	/				
	e	and outl) If requi	red due to	the actua	11 hazard 11tv ners	s assoct	lated with (265.51(h the waste f)) [3745-	e(s) handled -65-52(F)]	•• . –			\checkmark		
2		an evacu	lation plan	man Olan	and any D	olan rev	isions is	maintaine	d on-site an s that might 3745-65-53(A el changes	d has be				ON-SITE DUMITE ANY CM	rela ti
	١.	required to The plan is	revised 1	response	to facil	11ty, eq 5-65-54]	uipment a	and personn	el changes		*****	 -	<u> </u>	X43700	5 £
	١.	An emergenc familiar wi	y coordina th all asp	tor 1s des ects of si	ignated in the operation of the operatio	at all t tion and he Conti	times (on- i emergend ingency P	Idiii (w	•	the 5-55]	1				
	5.		- 4 4	Alon has i	occurred.	, the emo	ergency c	00141111100	has impleme ons and made [3745-65-5	a11			_		

Subpart I: Management of Containers

1.	Hazardous wastes are stored in containers which are:		•
	a) Closed (265.173) [3745-66-73(A)]	V —	\$
	b) In good physical condition (265.171) [3745-66-71]	<u> </u>	
	c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u> </u>	Attitudences and the control of the
2.	Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	, <	ROLL BACK
	Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u> </u>	
4.	The area where containers are stored is inspected for evidence of leaks or corrosi at least weekly and such inspections are documented. (265.174) [3745-66-74]	on	RECO CURY OF INSPECTION FORM
5.	Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]		
6.	Containers holding hazardous wastes are stored separate from other materials which		

Remark #

N/A

Yes

Date and Time of Inspection

		ran #
		HWFAB #
		U.S. EPA I.D. # OHD 617 497587
		City: SEBRING (W)
GENERAL INFORMATION	Address: LAKE PARK BIND AT HEAC	TELEPHONE.
Facility: AMERICAN STEEL	FOUNDRIS Address: LAKE PARK BIND. AT HEAC. County: MAHONING Tel	Tephone:
State: OHIO Zij	INSPECTION PARTICIPANT(S)	5
30000		(Telephone)
(Name)	(Title)	216/823-6150
1. DAVIDE, STAT	LER WORKS ENGINEER.	212/938-4018
1. DAVIDE STATE	MER. QUALITY AND ENUIRONMENTAL FO	16 PM IRS
2. CHARLES A. RUG	<u>50 / - 1</u>	
3.	INSPECTOR(S)	1 - 22
	INSPECTOR(S) ENVIRONMENTAL SCIENTIST	- 216/425-4111
1. KEVIN M. BONT	MAN ENVIRONMENTAL SCIENTIST	216/425-9171
2. JENNIE TUCNER	MAN ENVIRONMENTAL SELEN	
2		
3.	INSTALLATION ACTIVITY	which areas were reviewed.
	INSTALLATION ACTIVITY If the site is a TSDF, check the boxes indicating was a site in the site is a site in the site is a site in the sit	WILLELL AT 683
Mark One		/ / Waste Piles SO3
(6)	General Facility Standards, Preparedness	
/_/ Generator only (G)	General Facility Standards, Property and Prevention, Contingency and Emergency Manifests/Records/Reporting, Closure	/_/ Land Treatment D81
/_/ Transporter (T)	Manifests/Records/Report 1997	Landfills D80
	Containers SO1	
TSDF only		/// Chemical/Physical/ Biological TO4
- C T	/_/ Tanks S02/T01	
// G-T	/ / Surface Impoundments S04/T02	Groundwater Monitoring
/ / G-TSDF		
	/ / Incineration/Thermal Treatment	/_/ Post-Closure
/ / T-TSDF	,	
G-T-TSDF		
	TAGE 1	- 4-4 12/84

- Has the facility submitted a Part A to Ohio?
- 2. If "yes", is it complete and accurate?
- Has the facility submitted a Part B?
- Was advance notice of the inspection given? If so, how far in advance? IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

Remark # N/A No

REMARKS, GENERAL INFORMATION Include a brief description of site activity and waste handling.

REMARK 1 - PART A SUBMITTED TO US EPA AND DEPA. WITHDRAWL BY USTPA EFFECTIVE 19 APRIL 1983. DN 19 NOW. 1984, DEPA INSPECTED THIS FACILITY TO YERIFY REQUEST FEX WITHDRAWL OF PART A. PART A WITHDRAW LETTER SUBMITTED BY ASF TO BEPA ON 16 JULY 1981

SITE DESCRIPTION - THIS DISPOSAL SITE IS OWNIED BY ASF AND WAS FURMERLY A COAL STRIP MINE CATER MINED FOR CLAY. ASF HAS OPERATED THIS 12. 5 ACRE SITE FOR DISPOSAL OF FOUNDRY SAND, SCAG, SLUDGE AND EAF INFORMATION - 2 EMISSION CENTROL DUSTISED 12/84

KCKA TRICKII. STUTE		
40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMEN	Yes No N/A	Remark #
Subpart B: General Facility Standards		
 The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)] 	<u> </u>	<i></i>
 The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)] 		# 1
 a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)] 	<u> </u>	
b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]	<u> </u>	
IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".		
4. The facility has -	/	
a) A 24-hour surveillance system, <u>or</u>		. 一
b) An artificial or natural barrier <u>and</u> a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]		
5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]		
REMARKS - # 1 NO WASTE ANALYSIS PLAN DEVEL # Z ACCESSIBLE FROM WEST, SOUTH, SOUTH GENERAL FACILITY STANDARDS - 1 HEACOC	OPED THEAST VIA R RD. Re	v1sed 12/84

,		,	<u>1es</u>	ЙO	117 K	Kemark #
6.	a)	The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]		✓		# 3
	b)	Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]		<u> </u>	<u> </u>	<u> </u>
7.	Sec	facility has provided a Personnel Training Program in compliance with tion 265.16(a)(b)(c) including instruction in safe equipment operation and rgency response procedures, training new employees within 6 months and viding an annual training program refresher course. [3745-65-16(A)(B)(C)]	82-147	$\sqrt{}$	/ 	#4
8.	wri	facility keeps all records required by Section 265.16(d)(e) including tten job titles, job descriptions and documented employee training records.		<u>~</u>		#4
9.	inc	required due to the actual hazards associated with Ignitable, Reactive or ompatible waste materials, the facility meets the following requirements: ction 265.17) [3745-65-17]				-
	a)	Protection from sources of ignition.				
	b)	Physical separation of incompatible waste materials.				
بدر	c)	"No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.			1	·
		Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]				
	K	EMARKS - #3 NO INSPECTION PLAN DEVELOPED # 4 NO PERSONNEL TRAINING SPECIFIC	TO	j-/3)-2	ARO	6 <i>U</i> 5
		WASTE MANAGEMENT		•		
- 48 1		GENERAL FACILITY STANDARDS - 2			Davis	sed 12/84

Rev1sed 12/84

		<u>Yes</u>	<u>No</u>	<u>N/A</u>	Remark #
•	Subpart C: Preparedness and Prevention				
•	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]		<u> </u>		
	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]			/	
	a) Internal alarm .ystem.			$\overline{\wedge}$	<u></u>
	b) Access to telephone, radio or other device for summoning emergency assistance.		\checkmark		
	c) Portable fire control equipment.				
	d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.			$ \overline{} $	
3.	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	<u> </u>	<u> </u>		<u>#</u> 1
١.	If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	<u>\</u>	_		# 2
ā.	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]			<u>√</u>	
ō.	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]		-		# 3
7.	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]				
	REMARKS - # 1 REQURES COMMUNICATION DEVICE BE IM	MED,	ATE	29	AUAILABLE
	AT THE SCENE OF OPERATIONS. NO PHONE PREPAREDNESS AND PREVENTION - 1 PURING	WHS	1 110	PAICIFY	J. C
•	2 TRUCKS EQUIPPED WITH RADIOS			Revis	ed 12/84

		162	ĬÃΩ	MYA	Kemark #	
	Subpart D: Contingency and Emergency					
•	The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:		/		i.	
	a) Actions to be taken by personnel in the event of an emergency incident.		\		and the same of th	
	b) Arrangements or agreements with local or state emergency authorities.		\leq			-
	c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.		✓:		# 1	
	 d) A list of all emergency equipment including location, physical description and outline of capabilities. 				#	
	e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]		\checkmark	<u> </u>	# /	
	A copy of the Contingency Plan and any plan revisions is maintained, on-site and have been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)		<u>~</u>		# 1	
•	The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]		~		# 1	
•	An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]		_		* 2:	
i.	If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)	<u> </u>	· 	# 1 # 2	2
	PEMPERS - # 1 NO CONTINGENCY PLAN HAS BEEN # 2 NO DESIGNATED EMERGENCY COOK	0 E	VELO. NATUR	PED K	;	

Yes No N/A Remark #

Subpart E: Manifests/Records/Reporting

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1.

The Sec	operator maintains a written operating record at his facility as required by tion 265.73 [3745-65-73(A)] which contains the following information:			
a)	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]		<u> </u>	# (
b)	Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).		<u></u>	
c)	The estimated (or actual) weight, volume or density of the waste material(s).		<u> </u>	
d)	A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).		<u> </u>	
e)	The present physical location of each hazardous waste within the facility.		<u> </u>	
. f)	FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]		✓, –	
g)	Records of any waste analyses and trial tests required to be performed.		<u> </u>	
h)	Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).	<u> </u>	<u> </u>	
1)	Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]		<u> </u>	
j)	Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.			

		<u>Yes</u>	No	N/A	<u>Remark #</u>
2.	The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]		<u> </u>	-	± 2_
МО	TE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AN	ID DISI	POSAL	FACILII	TES.
3.	Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)		<u>√</u>		# 3
	a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]		$\sqrt{}$	· ——	# 3
	b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. $(265.71(a)(2))$ [3745-65-71(A)(2)]		<u> </u>		· #
4.	Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]				# 3
5.	If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]	P	<u> </u>		<u>#</u> 3
	REMARKS - # 1 FACILITY DOES NOT HAVE A WRITTEN	めんご	CATI	UG /	CECURD,
v	# 2 ANNUAL REPORTS HAVE NOT BEEN 5				
	43 MANIFESTS ARE NOT USED				

SUBPART F: GROUND WATER MONITORING

•			V = 0	No	Unknown	Walved
Тур	e of	facility: (check appropriately)	<u>Yes</u>	<u>No</u>	UIKIIUWII	Maived
	a) b) c)	surface impoundment landfill land treatment facility	<u></u>		P	
NOT	<u>E:</u>	UNDER INTERIM STATUS STANDARDS A WASTE PILE IS NOT SUBJECT TO GROUND WATER MONITORING REQUIREMENTS. PLEASE NOTE, HOWEVER, THAT IF ANY HAZARDOUS WASTE FROM A WASTE PILE IS LEFT IN PLACE AT CLOSURE, THE "WASTE PILE" BECOMES A "LANDFILL" AND MUST MEET POST-CLOSURE RULES APPLICABLE TO LANDFILLS.				
Gro	und !	Water Monitoring Program		,		
1.	Was If	the ground water monitoring program reviewed prior to site visit? "No",	general delication del	<u></u>	# 1	
	a)	Was the ground water program reviewed at the facility prior to site inspection?			# 1	
2.	fac aqu	a ground water monitoring program (capable of determining the . ility's impact on the quality of ground water in the uppermost ifer underlying the facility) been implemented? .90(a) [3745-65-90(A)]		<u> </u>	<u>#</u>	•
3.	agu	at least one monitoring well been installed in the uppermost ifer hydraulically upgradient from the limit of the waste agement area? 265.91(a)(1) [3745-65-9](A)(1)]	·	\$	N/A	#2
	a)	Are ground water samples from the uppermost aquifer, representative of background ground water quality and not affected by the facility (as ensured by proper well number, location and depths)?			~/A	# 2-

- 4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 265.91(a)(2) [3745-65-91(A)(2)]
 - a) Do well number, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?
- 5. Have the locations of the waste management areas been verified to conform with information in the ground water program?
 - a) If the facility contains multiple waste management components, is each component adequately monitored?
- 6. Do the numbers, locations, and depths of the ground water monitoring wells agree with the data in the ground water monitoring system program? If "No", explain discrepancies.
- 7. Well completion details. 265.91(c) [3745-65-91(C)]
 - a) Are wells properly cased?
 - b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?
 - c) Are annular spaces properly sealed to prevent contamination of ground water?

<u> </u>	- 	N/A	A 2-
) ·
	-42 .		And the state of t
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	· .		Did it was premium and the special section of the s
			And the state of t

Yes

No

Unknown Waived

			<u>Yes</u>	<u>No</u>	<u>Unknown</u>	Walved
•		a ground water sampling and analysis plan been developed?, .92(a) [3745-65-92(A)]			NA	# 2
	a)	Has it been followed?				
	b)	Is the plan kept at the facility?	MANUFACTURE		25	
	c)	Does the plan include procedures and techniques for:				
		1) Sample collection?				
		2) Sample preservation?	,			
		3) Sample shipment?		⁹		
		4) Analytical procedures?				
		5) Chain of custody control?				
•	qua	the required parameters in ground water samples being tested rterly for the first year? 265.92(b) [3745-65-92(B)] 265.92(c)(1) [3745-65-92(C)]				
	a)	Are the ground water samples analyzed for the following:				
		Parameters characterizing the suitability of the ground water as a drinking water supply? 265.92(b)(1) [3745-65-92(B)(1)]				
		<pre>2) Parameters establishing ground water quality? 265.92(b)(2) [3745-65-92(B)(2)]</pre>				
		3) Parameters used as indicators of ground water contamination? 265.92(b)(2) [3745-65-92(B)(3)]	Birth - Allenna			:
		(1) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 265.92(c)(2) [3745-65-92(C)(2)]				\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \

			<u>Yes</u>	<u>No</u>	<u>Unknown</u>	Walved
•		(11) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 265.92(c)(2) [3745-65-92(C)(2)]		·	~/A	#2
	b)	For facilities which have completed first year ground water sampling and analysis requirements:			<i>y</i>	·
		1) Have samples been obtained and analyzed for the ground water quality parameters at least annually? 265.92(d)(1) [3745-65-92(D)(1)]				
		2) Have samples been obtained and analyzed for the indicators of ground water contamination at least semi-annually? (4 replicate measurements per sample) 265.92(d)(2) [3745-65-92(D)(2)]		:		
	c)	Were ground water surface elevations determined at each monitoring well each time a sample was taken? 265.92(e) [3745-65-92(E)]				
	d)	Were ground water surface elevations evaluated annually to determine whether the monitoring wells are properly placed? 265.92(f) [3745-65-92(E)]				
	e)	If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 265.91(a) [3745-65-91(A)]? 265.93(f) [3745-65-93(F)]	g-1	-		
10.		an outline of a ground water quality assessment program been pared? 265.93(a) [3745-65-93(A)]			i i	
	a)	Does it describe a program capable of determining:				
, ex		1) Whether hazardous waste or hazardous waste constituents have entered the ground water?				
		2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground water?				
		3) Concentrations of hazardous waste or hazardous waste constituents in ground water?				
					W	

			162	ផ្តល់	OUKIOWI	ART LACO
		After the first year of monitoring, have at least four replicate measurements of each indicator parameter been obtained for samples taken for each well? 265.93(b) [3745-65-93(B)]			N/A	# 2
		1) Were the results compared with the initial background means from the upgradient well(s) determined during the first year?			71	
		(1) Was each well considered individually?				
		(11) Was the Student's t-test used (at the 0.01 level of significance?)				
		2) Was a significant increase (or pH decrease as well) found in the:				
		(1) Upgradient wells (If "Yes", Compliance Checklist A-2 must also be completed.) [3745-65-93(C)(1)]				
		(11) Downgradient wells	****			
	from	Yes", owner or operator must obtain, split, and analyze additional samples the wells where a significant difference was detected. If the difference onfirmed, the Director should be notified in writing within 7 days and a nd water assessment plan within 15 days. [3735-65-93(C)(2) and (D)(2)(3)]				
11.	Have and	records been kept of analyses for parameters in 265.92(c) (d) [3745-65-92(C) and (D)? 265.94(a)(1) [3745-65-94(A)(1)]				
12.	Have time	records been kept of ground water surface elevations taken at the of sampling for each well? 265.94(a)(1) [3745-65-94(A)(1)]				
13.	Have 265.	records been kept of required elevations in 265.93(b) [3745-65-93(B)]? 94(a)(1) [3745-65-94(A)(1)]				
14.	Have 265.	the following been submitted to the Director of the Ohio EPA: 94(a)(2) [3745-65-94(A)(2)]				
		Initial background concentrations of parameters listed in 265.92(b) [3745-65-92(B)] within 15 days after completing each quarterly analysis required during the first year?		<u></u>		

- b) For each well, have any parameters whose concentrations or values have exceeded the maximum contaminant levels allowed in drinking water supplied been separately identified?
- c) Annual reports including: [3745-65-94(A)(2)]
 - 1) Concentrations or values of parameters used as indicators of ground water contamination for each well along with required evaluations under 265.93(b) [3745-65-93(B)]?
 - 2) Any significant differences from initial background values in upgradient wells separately identified?
 - 3) Results of the evaluation of ground water surface elevations?

Comments: Subpart F

REMARKS - # 1 APPLICATION OF SUBPART F REQUIRES

DEVELOPMENT OF A GROUND WATER MONITORING

PROBRAM WHICH INCLUDES A SAMPLING AND ANALYSIS

PLAN, PROGRAM EVALUATION AND REPORTING REQUIRE—

MENTS THROUGHOUT THE ACTIVE LIFE OF THE FACILITY

BECAUSE THE ENVIRONMENTAL ASSESSMENT DOES NOT

FULFILL THE REGULATORY REQUIREMENTS OF SUBPART

F, THESE ITEMS WERE NOT APPLICABLE +0

THIS EVALUATION.

Unknown

Yes

Νo

Waived

Subpart G: Closure and Post-Closure NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES. 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12] a) A description of how and when the facility will be closed. (265.112(a)(1)) [3745-66-12(A)(1)]b) A description of how any of the applicable closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out. c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.) A description of steps taken to decontaminate facility equipment. e) The year closure is expected to begin and a schedule for the various phases of closure. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)] 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)] REMARKS - # , - NO CLOSURE PLAN HAS BEEN DEVELOPED.

Yes No

Remark #

N/A

		<u>Yes</u>	<u>No</u>	N/A	Remark #
•	Subpart H: Financial Requirements				
١.	The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]		ſ		# 1
	a) A closure trust fund, or				16
	b) A surety bond, or				-
	c) A closure letter of credit, or		<u> </u>		14-
	d) A combination of financial mechanisms.		~	; —	
2.	A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?			·	<u>#</u> [
3.	When was the most recent estimate made?				
4.	A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?		<u> </u>		# #
5.	When was the most recent estimate made?	 ~ _			
	REMARKS, GENERAL INTERIM STATUS REQUIREMENTS				
	REMARKS - #1 NO FINANCIAL ASSURANCE HAS BEEN				
	NOTE: THIS FORM DOES NOT IN	شدناد	3 C	CIAL	BILLTY
	REQUIREMENTS OF YOCER &	2 <i>6</i> 5 .	47	A	0

FINANCIAL REQUIREMENTS - 1

CAC 3145-66-47.

			<u>Yes</u>	. <u>No</u>	N/A	Remark #
		Subpart N: Landfills				
1.	Ger	neral Operating Requirements. Does the facility provide the following:				
<u>NO1</u>	<u>E</u> :	la, 1b AND 1c ARE EFFECTIVE ON NOVEMBER 19, 1981.				<i>j.</i>
	a)	Diversion of run-on away from active portions of the fill? (265.302(a)) [3745-68-02(A)]				- 1
	b)	Collection of run-off from active portions of the fill? (265.302(b)) [3745-68-02(B)]				<u>±</u> 1
	c)	Is collected run-off treated? [3745-68-02(B)]		1		# 1
	d)	Control of wind dispersal of hazardous waste? (265.302(d)) [3745-68-02(D)]		<u>~</u>		<u> </u>
2.	Sur	veying and Recordkeeping. Does the operating record include: [3745-68-09]				
	a)	a map showing the exact location and dimensions of each cell? (269.309(a)) [3745-68-09(A)]				±
	b)	The contents of each cell and the location of each hazardous waste type within each cell? (269.309(b) [3745-68-09(B)]				# 1
3.	Clo	sure and Post-Closure				
	a)	Is the closure Plan available for inspection?		~		# 2
	b)	Has this plan been submitted to the Regional Administrator?		V		# 2
. *	c)	Has Closure begun?			<u> </u>	# 2
	d)	Is Closure cost estimate available by?		<u></u>	-	<u> </u>
	K	CONSTRUCTION, OPERATION AND MAINTE,	VANC.	£ C,	2178.	516N) R1A
В		LANDFILLS - 1 CUIND DISPER	JAL		04-	- 4 70/04
		# 3 - NO CLOSURE PEANS DEVELOPED			KEVIS	ed 12/84
		# 3 - A DRUM WAS ABSTRUED IN WASTER AT AT	5011	1		

		Yes	- <u>No</u>	<u>N/A</u>	Remark #
4.	Special requirements for ignitable or reactive waste. (265.312(a)(B)				
	a) Are ignitable or reactive waste treated so the resulting mixture is no longer ignitable or reactive?		****	$\sqrt{}$	
TON	E: IF WASTE IS RENDERED NON-REACTIVE OR NON-IGNITABLE, SEE TREATMENT REQUIREMENTS. IF NOT, THE PROVISIONS OF 40 CFR 265.17(b) APPLY. [3745-65-17]				
5.	Special requirements for Incompatible Wastes.				
	a) Does the owner or operator dispose of incompatible wastes in separate cells? If not, the provisions of 40 CFR 265.17(b) apply. [3745-65-17]		 ;	\leq	
6.	Special requirements for Containers:	•	*4 5 7		
	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill? (265.315) [3745-57-85]				#3
7.	Special requirements for Liquid Waste.				
	Bulk or non-containerized liquid waste or waste containing free liquids is placed in a landfill having a liner and leachate collection and removal system meeting 264.301(a) requirements or is treated so that free liquids are no longer present. (265.314(a)) [3745-68-14(A)]		<u> </u>		
3.	A written Post-Closure Plan is on file at the facility.		<u> </u>		# 2
3.	The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation. (265.118(b))		<u> </u>		# 2
10.	The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure. (265.118(c))		\leq		<u># Z-</u>
1.	The property owner has attached a notation to the property deed or other instrument which will notify any potential purchaser that the property has been used to manage hazardous waste and future use of the property is restricted under Section 265.117(c) [3745-66-17(C)] as required in Section 265.120 [3745-66-10].		<u>~</u>		

LANDFILLS - 2

,		HWFAB # SEE REMARK
		U.S. EPA 1.D. # OHD 981909418 REMARK
		City: Acciance
GENERAL INFORMATION	WORKES Address: 1001 E. BROADWAY TO CODE: 44601 County: STARK Te	
Facility: American Steel for	County: STHRK Te	Tephone: 216/023-6750
State: OHIO Zij	p Code: 44601 County: STARR INSPECTION PARTICIPANT(S)	
	(Title)	(Telephone)
(Name)	•	216/823-6150
DAVID E STATE	LER WORKS ENGINEER	CAIRS 312/938-4018
1. Jay 1. 1. P. 1.	D. MGR. QUALITY AND ENVIRONMENTAL AL	**
2. CHARLES H		
3.	INSPECTOR(S)	311/1125-9/71
	S CONTRATE SCIENTIST	10/45
1. KENIN M. 15	DIOTE - SCIENTIST	
2 ENNIE TUCKE	RMAN ENVIRONMENTER	
3.	INSTALLATION ACTIVITY	Anuad
•••	INSTALLATION ACTIVITY If the site is a TSDF, check the boxes indicating	which areas were reviewed.
Mark One	If the site is a 150r, check the	/ / Waste Piles SO3
Mark one	General Facility Standards, Preparedness	
├ <mark>─</mark> / Generator only (G)		/ / Land Treatment D81
	and Prevention, Contingency Manifests/Records/Reporting, Closure	
/ / Transporter (T)	·	/_/ Landfills D80
/ / TSDF only	Containers S01	/ / Chemical/Physical/
1	/ / Tanks S02/T01	Biological TO4
/ G-T		/ / Groundwater Monitoring
/ / G-TSDF	/_/ Surface Impoundments S04/T02	Challanged House
/_/ 4-1301	/ / Incineration/Thermal Treatment	/ / Post-Closure
/_/ T-TSDF	<u>/ / / / / / / / / / / / / / / / / / / </u>	**************************************
. T TCDF		
G-T-TSDF		4 - •
·	INFORMATION - 7	Revised 12/84

- 1. Has the facility submitted a Part A to Ohio?
- If "yes", is it complete and accurate?
- 3. Has the facility submitted a Part B?
- 4. Was advance notice of the inspection given? If so, how far in advance?

 IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

REMARKS, GENERAL INFORMATION

Include a brief description of site activity and waste handling.

REMARK #1 - US EPA ID NUMBER WAS OBTAINED

BY US EPA FOR TRACKING PURPOSES.

ASF HAS NOT APPLIED FOR ID NUMBER

FOR THIS PRODUCTION FACILITY.

SITE DESCRIPTION - ASK IS A STEEL CASTING FACILITY WHICH

MANUFACTURES EQUIPMENT FOR THE RAILROAD INDUSTRY.

STEEL SCRAP IS USED EXCLUSIVELY IN THE SAND CASTING OPERATIONS.

ELECTRIC ARC FURNACE DUST IS COLLECTED IN A BAGNOUSE

AND THEN TRANSFERRED INTO DRUMS. PRIOR TO MAY, 1987

THIS WASTE (DOUG, DOOR) WAS MIXED WITH CLARIFIER

SLUDGE AND DISPOSEDINFORMATION - PRESENTLY THIS MATERIAL STREET SET 12/184

OFF-SITE.

40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

<u>,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,</u>		Yes	<u>No</u>	N/A	Remark #
1.	The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]		<u> </u>	.· 	± 1
2.	Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?				,
3.	Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]		<u> </u>		
4.	The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
	a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].		<u> </u>		# 2
	b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	¥	<u> </u>		#2
	c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].			· ——	# 2
	d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	-,			# 2
	e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]				# 2

- 5. The generator mea's the following hazardous waste pre-transport requirements:
 - a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]
 - b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].
 - c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].
 - 6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]
- 7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under <u>Section 262.34 [3745-52-34]</u>, the following requirements with respect to such storage are met:
 - a) The containers are clearly marked with the words "Hazardous Waste".
 - b) The date that accumulation began is clearly marked on each container.
- 8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]
- 9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].

<u>Y e s</u>	<u>No</u>	<u>N/A</u>	Kemark #

$$- \neq -$$

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE NOTE: INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

- ELECTRIC ARC FURNACE DUST HAS BEEN TESTED AND ACKNOWLEDGED TO BE HAZARDOUS BY EP TOXICITY CRITERIA FOR LEAD (DOOR) AND CADMIUM (DOGG). HOWEVER, GRINDING SLUDGE HAS NOT BEEN CHARACTERIZED

3 MANIFESTS WERE NEVER PREPARED OR MAINTAINED, SHIPMENTS WERE NOT PLACARDED

I'Y - THE REGULATORY REQUIREMENTS FOR THESE ITEMS ARE SPECIFIC TO PERSONS RESPONSIBLE FOR HAYARDOUS WASTE MANAGEMENT.

#5 - RECEASE OF EAF DUST BENEATH BAGHOUSE (FROM FOCLOWING PAGE)

		Yes	<u>No</u>	<u>N/A</u>	<u>Remark_#</u>
•	Subpart C: Preparedness and Prevention				
•	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	_	_	<u>.</u>	#5
	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]			/	
	a) Internal alarm .ystem.			<u>~</u>	<u> </u>
	b) Access to telephone, radio or other device for summoning emergency assistance.	\leq			
	c) Portable fire control equipment.			; <u>/</u>	
	d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.				
	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]		<u> </u>	•	
	If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	<u> </u>			
	If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]		<u> </u>	/	
٠.	If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]		•	<u> </u>	
	Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]		·	\checkmark	:

	•	
	Subpart D: Contingency and Emergency	
1.	The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:	ASF HAS NO. DEVELOPED A CONTINGENCE
	a) Actions to be taken by personnel in the event of an emergency incident. $-$	PLAN
	b) Arrangements or agreements with local or state emergency authorities.	
	c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.	
	d) A list of all emergency equipment including location, physical description and outline of capabilities.	<u> </u>
	e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)]	
2.	A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)]	44. 14. 14.
3.	The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]	
4.	An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55]	· ·
5.	If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)	

Remark #

N/A

Yes No

Subpart I: Management of Containers

•		<u>Yes</u>	<u>No</u>	<u>N/A</u>	Remark #
1.	Hazardous wastes are stored in containers which are:			.′	#
	a) Closed (265.173) [3745-66-73(A)]		<u> </u>		
	b) In good physical condition (265.171) [3745-66-71]	<u> </u>	<u> </u>		
	c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u> </u>			
2.	Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]		\checkmark	., 	
3.	Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	<u> </u>			SPILLAGE EUIDENT GROUN.
4.	The area where containers are stored is inspected for evidence of leaks or corrosio at least weekly and such inspections are documented. (265.174) [3745-66-74]	n 	<u> </u>	******	<u> </u>
5.	Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]			<u> </u>	
6.	Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]		*************		

Squire, Sanders & Dempsey

Additional Offices: Bruissels, Belgium Columbus, Ohio Miami, Florida New York, New York Phoenix, Arizona Washington, D.C. Counsellors at Law 1800 Huntington Building Cleveland, Ohio 44115 October 28, 1987

Telephone (216) 687.8500 Cable "Squiresand" Telex 985.661 Telecopier 1 (216) 687.8777 Telecopier 2 (216) 687.8780

Direct Dial Number 216/687-8646

Mr. Kevin Bonzo
Environmental Scientist
Division of Solid and Hazardous
Waste Management
Northeast District Office
2110 E. Aurora Road
Twinsburg, Ohio 44087-1969

Re: American Steel Foundries

Dear Mr. Bonzo:

I have been asked by American Steel Foundries to assist the company in preparing a response to your September 28, 1987 letter. In order to prepare a response, I am requesting a twoweek extension of time in which to send a reply.

I thank you for your anticipated cooperation.

Sincerely,

Geoffrey K. Barnes

GKB:bac

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OHIO EPA-N. E. D. O.

(Sex production)

Squire, Sanders & Dempsey

Additional Offices: Brussels, Belgium Columbus, Chio Mami, Florida New York, New York Phoenix, Arizona Washington, D.C. Counsellors at Law 1800 Huntington Building Cleveland, Ohio 44115

November 11, 1987

Telephone (216) 687-8500 Cable "Squiresand" Telex 185-661 Telecopier 1 (216) 687-8777 Telecopier 2 (216) 687-8780

Direct Deal Number

(216) 687-8646

Mr. Kevin Bonzo
Ohio Environmental Protection
Agency, Northeast District Office
2110 East Aurora Road
Twinsburg, Ohio 44087-1969

Re: American Steel Foundries
1001 East Broadway
Alliance, Ohio 44601
EPA I.D. No. OHD981090418; and
Sebring Township, Ohio
EPA I.D. No. OHD017497587

Dear Mr. Bonzo:

On behalf of American Steel Foundries (ASF), I am replying to your letter of September 28, 1987.

As a preliminary matter, it appears that your September 28, 1987 letter is basically a reiteration of claims or allegations previously made by your office. ASF has previously responded to essentially all of the allegations. To avoid unnecessary repetition, I have attached copies of my letters dated June 7, 1987 and August 25, 1987 (attachments A and B), which state ASF's position and interpretations, and which generally address the claimed violations.

The following responses will refer to the numbered paragraphs in your September 28, 1987 letter.

Production Facility

1. In August, 1980, ASF Alliance filed the Notification of Hazardous Waste Activity form. The form was preprinted with one of the I.D. numbers listed above.

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OHIO EPA-N.E.D.O.

Kevin Bonzo November 11, 1987 Page 2

In November, 1980, ASF Alliance submitted a protective filing for RCRA interim status. The application was withdrawn in 1982 when testing confirmed that none of the materials disposed were hazardous wastes as defined by any regulations under the Resource Conservation and Recovery Act (RCRA) or its Ohio counterpart. The June 25, 1982 letter requesting withdrawal expressly requested that the facility ID number be retained. The company has no reason to believe that U.S. EPA did not follow the express request to retain the I.D. number. In any event, correspondence from the U.S. EPA has indicated the above two listed I.D. numbers as applicable to, respectively, the production facility and the landfill.

- 2. Contrary to the assertion in paragraph 2 of your letter, a hazardous waste determination was made for the sludge generated during the grinding operation. The process involves a wet grinding of a steel casting with a coolant. Through the company's knowledge of the materials and the processes involved, including information provided by the coolant supplier, ASF had determined that the process would and did not generate a hazardous waste. If knowledge of the process supports such a determination, then the applicable regulations do not require that a separate test be performed. See e.g., 40 C.F.R. Section 262.11(c)(2).
- 3. By letters dated June 7, 1985 and August 8, 1985 (attachments A and B), ASF responded to the previous Ohio EPA inspection on April 26, 1985. As noted in those letters, ASF has not shipped hazardous wastes requiring manifests to its Sebring Township landfill.
- 4. The containers presently at ASF Alliance holding electric arc furnace baghouse dust (EAF dust) are holding such material for recycling to recover metal content therein by remelting. As such, the EAF material is not a solid waste under 40 C.F.R. 261.2(e) and is not subject to RCRA labeling requirements. See attachments A and B and discussion below.
- 5. The personnel training requirements of 40 C.F.R. 265.16 are applicable to hazardous waste treatment, storage or disposal facilities. ASF Alliance is not such a facility. See attachments A and B.
- 6. The "release" observed during the August 27, 1987 inspection was apparently a small amount of EAF dust beneath the hopper. The material was cleaned up and recycled. As the material is held for recycling, 40 C.F.R. 265.31 is not applicable as the material is not a hazardous waste.

Kevin Bonzo November 11, 1987 Page 3

7-11. The specific citations of interim status regulations applicable to hazardous waste treatment, storage or disposal facilities are inapplicable to the ASF Alliance facility as it does not treat, store nor dispose of hazardous waste as explained above. See attachments A and b.

12. Generator reports are not required of the ASF Alliance facility as it does not generate over 1000 kg/mo. of hazardous wastes.

Other Issues

The introductory portion of your September 28, 1987 letter refers to "reservations" of the Northeast District Office staff of the "legitimacy" of ASF's recycling of electric arc furnace dust for metal recovery. I do not understand the basis for any reservations. Both federal and state regulations provide that certain recycling activities are exempt from regulation under RCRA or its state counterpart. (Indeed, RCRA was intended to encourage recycling activities.) U.S. EPA has acknowledged that it has no jurisdiction under RCRA to regulate the reuse or reclaiming of secondary materials (which would otherwise be hazardous waste) in the furnace which produces them. See 50 Fed. Reg. 630 (January 4, 1985); 50 Fed. Reg. 49167 (November 29, 1985); 52 Fed. Reg. 16989-90 (May 6, 1987). These materials cease being hazardous wastes upon reuse or reclamation in this manner. Reuse of dust generated by an electric arc furnace within that furnace is clearly not regulated under RCRA or U.S. EPA regulations, and Ohio has no statutory authority to exceed the federal standards for hazardous waste regulations. other things, iron oxides in the electric arc furnace dust are incorporated into the product and serve as a substitute for raw materials. Under these circumstances, both Ohio and federal regulation clearly exempt this reuse activity from all RCRA regulation. Further, to the extent that either federal or state regulations would purport to regulate these activities, the regulations would be unlawful, as the United States Court of Appeals for the District of Columbia Circuit has recently stated in American Mining Congress v. EPA, 824 F.2d 1177 (D.C. Cir., 1987).

Please note that ASF is continuing to assess the present practice of recycling the electric arc furnace dust at the production facility. The company has not yet made a final decision as to the long term practices regarding the baghouse dust.

Squire, Sanders & Dempsey

Kevin Bonzo November 11, 1987 Page 4

In the "other issues" section of your letter, you indicated that you will be informing the local air agency of the recycling process so that they may evaluate compliance with the company's air permit. Although we do not understand the relevance of this issue in connection with a RCRA inspection, we assume that any air permit compliance issues will be addressed by the local air agency, and ASF will respond to any qustions raised by that group.

Disposal Facility

Items 1-13 of the listed violations all can be answered by the general statement of ASF's position in attachments A and B. Hazardous wastes were not disposed of at the landfill. As such, the landfill is not an RCRA disposal facility and all listed violations of 40 C.F.R. 265 are, as such, not applicable to the facility.

14. Since the disposal facility did not receive hazardous wastes, the referenced regulations do not apply.

Items 15 and 16 are again answered as per items 1-13, in that the facility is not a hazardous waste landfill and, as such, the cited regulations are not applicable.

Your September 28, 1987 letter suggests the need to "rinse" the containers previously used to combine electric arc furnace dust with clarifier sludge. For reasons outlined in attachments A and B, we do not believe that any of the associated containers are subject to the cited regulations. Even assuming, however, that the regulations applied, ASF does not believe that any hazardous wastes remained in the containers.

Conclusion

It seems apparent that there remains a broad difference of opinion between ASF and the Ohio EPA Northeast District Office as to the interpretation of laws and regulations. Despite these apparent

Squire, Sanders & Dempsey

Kevin Bonzo November 11, 1987 Page 5

differences, ASF would like to meet with the Ohio EPA Northeast District Office before too long in order to attempt to resolve some of these issues.

Very truly yours,

Geoffrey K. Barnes

GKB/ma

cc: E.J. Brosius, Esq.

C.R. Dixon C.A. Ruud

State of Ohio Environmental Protection Agency

P.O. Box 1049, 1800 WaterMark Dr. Columbus, Ohio 43266-0149

Richard F. Celeste Governor

MEMORANDUM

TO:

Daye Ranking, USEPA

FROM:

John Albrecht

RE:

Amsted Information

DATE:

April 6, 1990

Here is some information on Amsted. Let me know if you need additional information.

General Information

Amsted (American Steel Foundries) 1001 E. Broadway Alliance, Ohio

- -Indirect discharger to the Alliance POTW.
- -Discharge flow approximately 256,000 gpd
- -Categorical industry regulated under 40 CFR 464 Subpart C

Compliance Status

The following was taken from Alliance's Quarterly Industrial User Violation Reports:

Period of October, 1989 - January, 1990

Exceeded monthly average for phenols and daily maximum for oil and grease. NOV issued by the city for 464 violations.

Facility has completed jar studies for phenol. Further studies needed. Facility searching for oil and grease entering process water.

Period of January, 1989 - April, 1989

Monthly average violations for phenols. NOV sent by the city. Two meetings were held with the facility.

The last two IU self-monitoring reports are attached.

CITY OF ALLIANCE

LIANCE

STARK



REPORTED

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NAME, ADDRESS, CITY, COUNTY, ZIP

251 ROCKHILL NE

44601

STATION CODE

DATE (MONTH, YEAR)

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SAMPLING STATION DESCRIPTION

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DATE REPORT COMPLETED

Aug. 11, 1989

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NAME, ADDRESS, CITY, COUNTY, ZIP

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31 ROCKHILL AVE. NE LLLIANCE, OH 44601 STARK FEB 1990

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SAMPLING STATION DESCRIPTION

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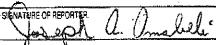
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JREEN - REPORTER FORMERLY EPA-SUR

DATE REPORT COMPLETED Jan. 30, 1990



Coordinator ZE:ZI 06. 90 840